



# DRAFT ENVIRONMENTAL IMPACT REPORT

## 6220 W. Yucca Project

Environmental Case: ENV- 2014-4706-EIR  
State Clearinghouse No.: 2015111073

**Project Location:** 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue Los Angeles, California, 90028

**Community Plan Area:** Hollywood

**Council District:** 13

**Project Description:** The Project proposes to redevelop an approximately 1.16-acre (net area) property with a mixed-use residential, hotel, and commercial/restaurant project (the Project), within the Hollywood Community Plan area of the City of Los Angeles. The subject property is currently improved with 44 residential units contained within six structures, all of which would be demolished and removed to allow development of the Project. Overall, the Project would include 210 multi-family residential units, 136 hotel rooms and approximately 12,570 square feet of commercial/restaurant uses in two buildings, with one 20-story, 255-foot mixed-use tower (Building 1), and one 3-story 47-foot residential building (Building 2). The total Floor Area Ratio (FAR) for the Project would be 6.6:1. Parking would be provided on-site within the six-level parking structure housed within the podium structure of Building 1 and the two-level parking structure housed within Building 2. The Project is an Environmental Leadership Development Project (ELDP) under Assembly Bill 900, certified by the Governor on July 26, 2017.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

ESA

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# Executive Summary

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This Draft Environmental Impact Report (EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code sections 21000 et. seq.) in accordance with CEQA Guidelines §15123. Accordingly, this chapter of the EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process, including areas of controversy known to the lead agency; (3) identification of potentially significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; and (4) issues to be resolved, including the choice among alternatives and whether and how to mitigate the potential significant impacts.

## 1. Project Description

The Project proposes to redevelop an approximately 1.16-acre (net area) property on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue, generally referenced as 6220 West Yucca Street (Project Site), with a mixed-use residential, hotel, and commercial/restaurant project (the Project). The Project Site is located within the Hollywood community of the City of Los Angeles (City), and is currently improved with one single-family residence, one duplex with a detached garage and a studio apartment over the garage, and three, two-story apartment buildings with associated carports and paved surface parking areas, all of which would be demolished and removed to allow development of the Project. Overall, the Project Site currently contains a total of 43 multi-family units (duplex = 2 units; 1 studio apartment over the duplex garage, apartment buildings = 40 units) and one single-family residence. Thus, there are a total of 44 residential units currently on the Project Site.

The Project would consist of Building 1 and Building 2. Building 1 of the Project, located at the southeast corner of Yucca/Argyle, would occupy the majority of the Project Site. It would include a six-level podium parking structure with: two fully subterranean levels (P3 and P2 Levels); two semi-subterranean levels (P1 and L1 Levels – due to site's sloping topography); and two entirely above ground levels (L2 and L3). Atop Level 3 (the highest podium level), Building 1 would include Levels 4 through 20. Thus, Building 1 would be up to 255 feet tall as viewed from Argyle Avenue (at the lowest adjacent surface point along Argyle Avenue). From Yucca Street, Building 1 would be 20 stories tall. Level L1 is referred to herein as the Ground Level as it primarily fronts Yucca Street. Building 1 would include a mix of commercial, hotel and residential uses. Building 2, located at the southwest corner of Yucca Street and Vista Del Mar Avenue, would include three residential levels over a 2-story podium parking structure, which would include one

subterranean parking level (P2 Level) and one semi-subterranean parking level (P1 Level). Building 2 would have a maximum elevation of approximately 34 feet as viewed from Yucca Street. Due to the sloping topography along Vista Del Mar Avenue, the maximum elevation of Building 2 at the southern Project Site boundary would be approximately 47 feet, as a portion of the semi-subterranean P1 parking level would be visible from Vista Del Mar Avenue at this location. Building 2 would consist of only residential uses.

Overall, the Project (inclusive of both buildings) would include 210 multi-family residential units, 136 hotel rooms and approximately 12,570 square feet of commercial/restaurant uses. Parking would be provided on-site within the six-level parking structure housed within the podium structure of Building 1 and the two-level parking structure housed within Building 2.

## 2. Issues Raised During Notice of Preparation Process

The following summarizes the key potential environmental issues raised in response to the NOP and during the public scoping meeting (the reference in parenthesis is the EIR chapter/section in which the analysis is provided). The comments on the Initial Study as part of the NOP process are contained in Appendix A of this EIR.

- Loss of Rent Stabilized (RSO) Housing and citywide housing shortage (Refer to Chapter II, *Project Description*, and Section IV.J, *Population and Housing*, of this EIR).
- Visibility and proximity of above-grade parking podium to residential properties and areas where children play (Refer to Section IV.A, *Aesthetics*, of this EIR.)
- Reduced green space (Refer to Chapter II, *Project Description*, and Section IV.A, *Aesthetics*, of this EIR.
- Effects of building height on views of clear air and blue (Refer to Section IV.A, *Aesthetics*, of this EIR.
- Effects of shading on existing residential uses (Refer to Section IV.A, *Aesthetics*, of this EIR.)
- Construction and operational air emissions (Refer to Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this EIR.)
- Effects of dust from construction trucks and grading (Refer to Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this EIR.)
- Relationship of Project to the active Hollywood Fault (Refer to Section IV.E, *Geology and Soils*, of this EIR.)
- Seismic risk in new construction (Refer to Section IV.E, *Geology and Soils*, of this EIR.)

- Generation of greenhouse gas emissions (Refer to Section IV.F, *Greenhouse Gas Emissions*, of this EIR.)
- Potential saturation of hotel uses in the Hollywood Community (Refer to Section IV.H, *Land Use and Planning*, of this EIR.)
- Effects of construction activity noise levels on adjacent uses (Refer to Section IV.I, *Noise*, of this EIR.)
- Construction truck noise (Refer to Section IV.I, *Noise*, of this EIR.)
- Operational noise resulting from outdoor activity (Refer to (Refer to Section IV.I, *Noise*, of this EIR.)
- Need for tenants' right of return (Refer to Chapter II, *Project Description*, and Section IV.J, *Population and Housing*, of this EIR).
- Effects of construction and operation traffic on emergency access (Refer to Sections IV.K.1, *Fire Protection*, and IV.L, *Transportation*, of this EIR.)
- Effects on schools (Refer to Chapter IV.K.3, *Schools*, of this Draft EIR.)
- Effects parks and community facilities (Refer to Chapter IV.K.4, *Parks and Recreation*, of this Draft EIR.)
- The Project's traffic impact on the Yucca Street/Argyle Avenue intersection. (Refer to Section IV.L, *Transportation*, of this EIR.)
- Cumulative traffic impacts from simultaneous construction projects (Refer to Section IV.L, *Transportation*, of this EIR.)
- Cumulative traffic impacts at the U.S.-101 off-ramps and on-ramps (Refer to Section IV.L, *Transportation*, of this EIR.)
- Effects of Project and cumulative construction traffic on school children walking to school and the nearby dance academy (Refer to Section IV.L, *Transportation*, of this EIR)
- Water demand and availability of water supply (Refer to Section IV.N.1, *Water Supply*, of this EIR.)
- Effects of construction on water and power infrastructure (Refer to Chapter IV.N.1, *Utilities*, of this Draft EIR.)

### 3. Significant and Unavoidable Environmental Impacts

Based on the analysis contained in Chapter 4.0, *Environmental Impact Analysis*, of this Draft EIR, the Project would result in a significant and unavoidable construction noise and vibration impacts to nearby noise/vibration sensitive receptors.

**Construction Noise:** As analyzed in Section IV.I, *Noise and Vibration*, MM-NOI-1 provides for sound barriers that would achieve a noise reduction of 15 dBA

between Project construction and off-site receptor locations along Argyle Avenue (R1), Vista Del Mar Avenue (R3), and Carlos Avenue (R4). Sound barriers would not be feasible to reduce the impacts to sensitive receptors (represented by measurement location/sensitive receptor location R2) along the north of Yucca Street since the Project's construction staging area and/or traffic entrance would be located on the south side of Yucca Street adjacent to the Project Site. Although the noise reduction provided by the noise barriers would be considered a substantial reduction, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at the residential uses along Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3) during some phases of construction. In addition, the sound barrier would not reduce the noise levels at the upper floors (i.e., 3<sup>rd</sup> to 18<sup>th</sup> floor) of the multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue (R1) or the upper floors (i.e. 3<sup>rd</sup> floor to 5<sup>th</sup> floor) of the five-story mixed-use residential uses (R4) along Carlos Avenue since the proposed sound barrier would not block the line of sight between the construction site and upper floors of the 18-story multi-family residential use (R1) or the five-story mixed-use residential uses (R4). Thus, construction noise impacts would be significant and unavoidable at the upper floors (i.e., 3<sup>rd</sup> to 18<sup>th</sup> floor) of the multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue (R1), at the adjacent residential uses along Vista Del Mar Avenue (R3), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (R4), and those on the north side of Yucca Street (R2), even after implementation of MM-NOI-1.

MM-NOI-2 requires Project contractors to employ state-of-the-art noise minimization strategies, as feasible, when using mechanized construction equipment. While noise minimization strategies will reduce noise where feasible, construction noise impacts would remain significant and unavoidable, even with implementation of MM-NOI-1 and MM-NOI-2 together.

**Construction Groundborne Vibration/Noise.** Implementation of MM-NOI-3 would ensure that construction groundborne vibration levels would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue (R3). This mitigation measure requires a 15-foot buffer between the nearest residential building and heavy construction equipment operations. At 15 feet, the groundborne vibration levels would be reduced to 0.191 inches per second (PPV). The mitigated level of 0.191 inches per second (PPV) is less than, but still close to the significance threshold of 0.2 inches per second (PPV). Therefore, MM-NOI-4 is also recommended to mitigate potential groundborne vibration impacts. Implementation of MM-NOI-4 would ensure that groundborne vibration levels are below the thresholds associated with potential damage to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction. However,

because MM-NOI-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.

In addition, temporary construction-related groundborne vibration and groundborne noise impacts on human annoyance would be reduced at the adjacent residential uses along the west side Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3). However, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. Therefore, temporary construction-related groundborne vibration structural and groundborne vibration and noise human annoyance impacts would be significant and unavoidable.

## **4. Alternatives that Would Reduce or Avoid Significant Impacts**

### **a) Alternative 1: No Project/No Build Alternative**

The No Project/No Build Alternative (Alternative 1) assumes that the Project would not be constructed. The site would continue to operate with one single-family residence, one duplex and a studio apartment, and three, two-story apartment buildings (43 existing multi-family/apartment units total) and associated carports and paved surface parking areas. Unlike the Project, the No Project/No Build Alternative would not increase the City's supply of rent stabilized residential units, increase housing density within the existing transportation priority area, or revitalize and upgrade the character of the street front with improved sidewalks, shade trees, lighting, and street-oriented retail and restaurant uses.

### **b) Alternative 2: Primarily Residential Mixed-Use**

The Primarily Residential Mixed-Use Alternative (Alternative 2) would include the two buildings (Buildings 1 and 2) and the same floor area as under the Project. Building 1 would provide approximately 300,603 square feet of floor area and 254 units and Building 2 would provide approximately 16,345 square feet of floor area and 17 residential units. Alternative 2 would provide a total of 271 RSO units and would result in a net increase of 227 residential units, compared to the Project, which would result in a net increase of 166 residential units. As with the Project, all residential units would comply with the City's Rent Stabilization Ordinance.

Alternative 2 would result in an FAR of 6.6:1, the same as under the Project. The heights and mass of the two buildings, including the 20-story Building 1 (225 feet

in elevation) and three-story Building 2 (47 feet maximum elevation) would be the same under the Project.

However, Alternative 2 would eliminate all hotel rooms, and reduce the Project's commercial/restaurant floor area from 12,570 square feet to 5,120 square feet. Alternative 2 would also reduce the Project's parking requirements from 415 spaces to 348 spaces. Building 1 would also include 152 bicycle parking spaces, compared to 243 spaces under the Project. As with the Project, Building 1 parking facilities would be accessed via a single driveway on Argyle Avenue and a single driveway on Yucca Street. Alternative 2's residential land retail floor area would be located on Level 1 along the Yucca Street frontage, including the corner of Yucca Street and Argyle Avenue. Building 2 would provide 21 underground vehicle parking spaces and 19 bicycle parking spaces, and would be accessed via a single driveway on Vista Del Mar Avenue. Because of the drop in elevation toward the south, the parking structure would be below grade in the north sector of the Project Site along the Vista Del Mar Avenue and above grade in the south sector of the property. Respectively, Building 2 would measure 34 feet to the top of the roof gable relative to Vista Del Mar Avenue in the north sector of the Project Site and measure to 47 feet relative to Vista Del Mar Avenue in the south sector of the Project Site due to Vista Del Mar's drop in elevation toward the south.

The purpose of this Alternative is to determine whether the elimination of the hotel use and reduction in commercial floor area would reduce the Project's VMT (mitigated to less than significant levels under the Project) and reduce the Project's significant and unavoidable, although temporary, construction noise and vibration impacts to less than significant levels. As discussed in Chapter V, *Alternatives*, of this Draft EIR, Alternative 2 would incrementally reduce the Project's operation VMT impacts and, because of less required parking than under the Project, would reduce excavation requirements for the underground parking structure. However, peak construction activity would still generate significant and unavoidable, temporary construction noise and vibration impacts, as under the Project. Although because of less excavation, the duration of impacts related to noise and vibration levels during the excavation phase would be less than under the Project.

### **c) Alternative 3: No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative**

The Code-Compliant Reduced Density Alternative (Alternative 3) would provide 101 RSO residential units and eliminate the Project's hotel, retail, and restaurant uses. Development under Alternative 3 would be consistent with three zoning designations over the Project Site, including C4-2D-SN and R4-2D in the west sector fronting Yucca Street and Argyle Avenue, and (Q)R3-IXL in the east sector fronting Yucca Street and Vista Del Mar Avenue. All of these zones allow multi-family residential development. The existing C4 and R4 zones permit multi-family

uses up to the R4 density, which requires a minimum density of 400 square feet of lot area per unit. The existing R3 zone in the east sector allows multi-family uses requires a minimum of 800 square feet of lot area per unit. The R4-zoned sector has a total of 39,421.9 square feet of lot area; thus, allowing the construction of up to 98 residential units. The R3-zoned sector of the Project Site contains 10,941.9 square feet, which allows up to 13 residential units. Alternative 3 would provide a total of 101 residential units, which would be consistent with the zoning designation and the number of residential units that could be developed on the Project Site without the need for additional approvals. With the subtraction of the Project Site's existing 44 RSO residential units, Alternative 3 would result in a net increase of 57 residential units.

Building construction in the C4- and R4-zoned sectors would be four stories of Type III construction and a single-story parking podium of Type I construction, for a total of five stories. In the R3 zones, the building would be tiered to meet the 1XL, 30-foot height constraint along Vista Del Mar Avenue.

Alternative 3 would require approximately 96 automobile parking spaces, compared to a total of 436 spaces (415 spaces for Building 1 and 21 spaces for Building 2), required for the Project. Alternative 3 would also require 81 long-term bicycle parking spaces and 8 short-term bicycle spaces.

The purpose of Alternative 3 is to determine whether development under the existing zoning entitlement would reduce the Project's VMT impacts (mitigated to less than significant levels under the Project) and reduce the Project's significant and unavoidable, although temporary, construction noise and vibration impacts to less than significant levels.

As discussed in Chapter V, *Alternatives*, of this Draft EIR, Alternative 3 would incrementally reduce the Project's operation VMT impacts and, because of less required parking than under the Project, would reduce excavation requirements for the underground parking structure. However, peak construction activity would still generate significant and unavoidable, temporary construction noise vibration impacts, as under the Project. Although because of less excavation, the duration of impacts related to noise and vibration levels during the excavation phase would be less than under the Project.

#### **d) Alternative 4: Primarily Office Mixed-Use**

The Primarily Office Mixed-Use Alternative (Alternative 4) would consist of a low-rise commercial building (Building 1) in the West Parcel and a 13-unit condominium building (Building 2) in the East Parcel. The residential units would be intended for purchase and, as such, would not be RSO units. The West Parcel's commercial building would provide approximately with 100,000 square feet of office space, 3,000 square feet of retail space, and 9,000 square feet of restaurant space. The total floor area of the commercial building would be approximately 112,000 square

feet. The floor area ratio (FAR) for Building 1 would be approximately 2.84:1 within the approximately 39,421.9-square-foot West Parcel. The East Parcel, which comprises approximately 10,941.9 square feet, would be used for development of the residential component. The residential building would be similar to the Project's Building 2. The residential density (13 units) would be consistent with the existing R3 zone, which requires a minimum of 800 square feet of lot area per unit. Setbacks from lot lines would be similar to those of the Project and consisted with the respective zoning designation.

Alternative 4 would require approximately 205 automobile parking spaces, compared to a total of 436 spaces (415 spaces for Building 1 and 21 spaces for Building 2), under the Project. Alternative 4 would also provide 62 bicycle parking spaces and 8 short-term bicycle spaces. Alternative 4 would also provide 39 long-term bicycle parking spaces and 17 short-term bicycle spaces. Parking for would be located in two partially parking levels, accessed via single driveways on Argyle Avenue and Yucca Street. Parking for Building 1 would be located in two partially subterranean levels, accessed via single driveways from Argyle Avenue and Yucca Street. Parking for Building 2 would be located within two-levels of subterranean and semi-subterranean parking below Building 2. Building 2 parking access would be via Vista Del Mar Avenue.

The purpose of Alternative 4 is to determine whether the change from a primarily residential use to a primarily office use would reduce the Project's VMT impacts (mitigated to less than significant levels under the Project) and reduce the Project's significant and unavoidable, although temporary, construction noise vibration impacts to less than significant levels.

As discussed in Chapter V, *Alternatives*, of this Draft EIR, Alternative 4 would incrementally increase the Project's VMT impacts and, because of less required parking than under the Project, would reduce excavation requirements for the underground parking structure. However, peak construction activity would still generate significant and unavoidable, temporary construction noise and vibration impacts, as under the Project. Although because of less excavation, the duration of impacts related to noise and vibration levels during the excavation phase would be less than under the Project.

## **e) Environmentally Superior Alternative**

California 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. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes



(1) the No Project/No Build Alternative, (2) the Primarily Residential Mixed-Use Alternative, (3) the Code-Compliant Alternative, and (4) the Primarily Office Mixed-Use Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in Chapter V, Table V-13, *Comparison of Impacts Associated with the Alternatives and the Project*, of this Draft EIR. As indicated in Table V-13, the No Project/No Build Alternative would have no direct impacts on the environment and, as such would have fewer environmental consequences than under the Project or other Alternatives. Further, No Project/No Build Alternative would avoid the Project's short term significant and unavoidable construction noise vibration impacts. Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative.

However, this Alternative would not provide the beneficial effects of the Project and other Alternatives. As shown in Table V-14, *Ability of Alternatives to Meet Project Objectives*, the No Project/No Build Alternative would not allow for high-density residential or commercial uses within a Transit Priority Area (TPA). Thus, it would not promote a land use pattern that reduces VMT or meet any of the other objectives of the Project.

Alternative 2, the Primarily Residential Mixed-Use Alternative, would reduce the Project's less than significant light and glare, construction (less than significant after mitigation) and operation air emissions, archaeological and paleontological resources, exacerbation of existing geological conditions, unstable geological units, GHG, construction hydrology and water quality, operation noise, population/housing, police protection, VMT, water, wastewater, and solid waste impacts. However, Alternative 2 would incrementally increase the Project's less than significant impacts on schools, libraries, and parks/recreational facilities. Alternative 2 and the other Alternatives would reduce the duration of the Project's significant and unavoidable short-term construction noise and vibration impacts, but would not reduce these impacts to less than significant levels. As shown in Table V-14, Alternative 2 would partially or fully meet all of the Project objectives, including the concentration of high-density housing in a TPA.

Alternative 3, the No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative, and Alternative 4, the Primarily Office Mixed-Use Alternative, would reduce most of the Project's less than significant impacts because of their reduced building sizes and smaller scale of development, resulting in lower residential occupancy and shorter duration of construction activity. Although these Alternatives would reduce the duration of the Project's significant and unavoidable construction noise and vibration impacts, it would not reduce these impacts to less than significant levels.

Alternatives 3 and 4 would not implement the intent of the TPA to densify housing in proximity to a transit station compared to Alternative 2. Therefore, Alternatives 3 and 4 would not contribute to the same extent as the Project and Alternative 2 to a land use pattern conducive to a reduction in Citywide VMT, which is part of the intent of the TPA designation. Alternative 4 would result in a net housing deficit, and would not provide RSO (rental) units, or replacement housing for existing removed residential units. As such, it would not address Citywide housing shortages, or accommodate right of return for existing on-site residents. Both Alternatives 3 and 4 would not meet several of the expressed purposes and objectives of the Project (see Table V-14).

In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, Alternative 2 is selected as the Environmentally Superior Alternative since it would incrementally reduce several of the Project's environmental impacts and would be substantially consistent with the purpose of the Project, particularly with respect to City policies regarding concentration of development within Regional Centers and TPAs for the purpose of reducing VMT.

## 5. Summary of Environmental Impacts

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

As shown in Table ES-1, based on analyses contained in this EIR the Project would result in significant and unavoidable noise and vibration impacts during construction. The implementation of project design features and/or feasible mitigation measures would not reduce these effects to less than significant levels. As such, impacts associated with temporary construction noise and vibration would remain significant and unavoidable.

Other issues addressed in the Draft EIR, in which impacts were determined to be less than significant with or without mitigation, include aesthetics, air quality, cultural resources, energy, greenhouse gas emissions, geology/soils, hydrology and water quality, land use, operational noise, population/housing, public services (fire, police, schools, parks/recreation and libraries), tribal cultural resources, transportation, and utilities.

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

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<b>IV.A AESTHETICS</b>			
<p><b>VIEW IMPACTS:</b> The Project would not substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views. It would not block panoramic views that occur in the background of open street corridors (such as views of the Hollywood Sign through north-facing Gower Street). Existing residences within the Vista Del Mar Avenue/Carlos Street Historic District and surrounding residences do not currently have views of the Capitol Records Building or other scenic resources across the Project Site. The Project would not have a substantial adverse effect on a scenic vista. Furthermore, with the exception of the Project's aesthetic impacts on historical resources as analyzed in Section IV.C of the Draft EIR, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not significant pursuant to SB 743 and ZI No. 2452.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<p><b>SCENIC RESOURCES:</b> The Project would not adversely affect the aesthetic character, including design, materials, workmanship, feeling, setting, and association of the area's historic resources or substantially damage scenic resources, including but not limited to trees, rock outcroppings, or historic buildings in a state designated scenic highway. Moreover, the design of Building 2 would eliminate any potential for Project indirect aesthetic impacts on the Vista Del Mar-Carlos Historic</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p>District. Furthermore, with the exception of the Project's aesthetic impacts on historical resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not considered significant pursuant to SB 743 and ZI No. 2452.</p>			
<p><b><u>VISUAL CHARACTER – CONSISTENCY WITH SCENIC QUALITY REGULATIONS:</u></b></p> <p>The Project would not adversely impact views or change the natural character and topography of mountainous parts of the Community and would not conflict with the objective of the Hollywood Community Plan to provide enjoyment of open space by both local residents and persons throughout the Los Angeles region. Therefore, the Project would be consistent with the Community Plan's Objective 7 to preserve Hollywood's open space resources. In addition, as discussed in Section IV.H, <i>Land Use</i>, of this Draft EIR, the Project would be substantially consistent with the LAMC and other regulations that govern scenic quality. Impacts with respect to consistency with regulations that govern scenic quality would be less than significant.</p>	<p>No project design features are applicable.</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>
<p><b><u>VISUAL CHARACTER – CONSTRUCTION:</u></b></p> <p>Construction activities would be short-term and screened in accordance with PDF-AES-2. With screening to block the site from view of the Project Site from the street during construction and the short-term, temporary nature of construction activities, construction of the Project would not substantially degrade the visual character of the adjacent and surrounding neighborhood.</p>	<p><b>PDF-AES-2:</b> Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity of new buildings from view at the street level. The fence will be located along all perimeters of the Project Site with a minimum height of 8 feet. The Project Applicant will ensure through appropriate postings and daily visual</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not considered significant pursuant to SB 743 and ZI No. 2452.	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.		
<p><b><u>VISUAL CHARACTER – OPERATION:</u></b></p> <p>The Project would provide new high-quality architecture and other visual features that would be consistent with and improve the visual character of the surrounding area. Although the exceedance of LA CEQA Thresholds Guide shade and shadow requirements at a neighboring property would potentially degrade the existing visual character of that off-site property, the analysis related thereto is provided for informational purposes only and the aesthetics impacts of the Project related to shade and shadow are not significant pursuant to SB 743 and ZI No. 2452. As other aesthetic impacts analyzed herein are similarly not significant under SB 743 and ZI No. 2452, the Project would not result in significant aesthetic impacts related to applicable zoning and other regulations governing scenic quality.</p>	<p><b>PDF-AES-1:</b> Any utility poles remaining at the Project Site will be removed and new lines for sewer, power, gas, and telecommunication systems will be relocated underground.</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>
<p><b><u>LIGHT AND GLARE:</u></b></p> <p>With the incorporation of Project design features, construction of the Project would not create a new</p>	<p><b>PDF-AES-3:</b> Outdoor lighting along public streets and associated with rooftop and courtyard lighting, decorative lighting and building</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p>source of substantial light which would adversely affect day or nighttime views in the area. Impacts with respect to construction lighting would be less than significant. With implementation of PDF-AES-3, the Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area. Impacts with respect to operational lighting would be less than significant.</p> <p>Construction activities would not result in large expanses of flat, shiny surfaces that would reflect sunlight or cause other natural glare. Impacts with respect to construction glare would be less than significant. Operational impacts related to daytime or nighttime glare would be less than significant with implementation of PDF-AES-3 and PDF-AES-4.</p> <p>With the incorporation of the Project Design Features, and compliance with the applicable LAMC regulations, lighting and illuminated signage associated with the Project would not create a new source of light that would adversely affect day or nighttime views in the area.</p> <p>Project design feature PDF-AES-5 would ensure that potential glare from the building façade would not create a new source of glare that would adversely affect day or nighttime views in the area or interfere with the performance of off-site activities. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project related to glare are not significant pursuant to SB 743 and ZI No. 2452.</p>	<p>security lighting, will be placed and directed, and of a fixture type, to minimize visibility from adjacent residential uses.</p> <p><b>PDF-AES-4:</b> Although the Center Parcel is not located within the Hollywood Signage SUD, any proposed signs will be reviewed by the Department of City Planning for consistency with the Hollywood Signage SUD, as required for the West Parcel. Consistency includes ensuring that signs serve only on-site uses, are coordinated with the architectural design for the parcel, are appropriately scaled to the buildings on the parcel, and result in a visually uncluttered appearance.</p> <p><b>PDF-AES-5:</b> 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). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.</p>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<b>IV.B AIR QUALITY</b>			
<p><b><u>CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN:</u></b></p> <p>The Project would not exceed any State or federal standards or delay timely attainment of air quality standards or interim emission reductions specified in the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). The Project has incorporated appropriate control strategies and would be consistent with the growth projections in the 2016 AQMP. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives of reducing vehicle miles traveled (VMT) and the related vehicular air emissions, the Project would be consistent with AQMP land use policies. Thus, the Project would not conflict with or obstruct implementation of the AQMP. Finally, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality. The Project's impacts under this threshold would be less than significant.</p>	Refer to PDF-GHG-2 and PDF-GHG-3, below.	No mitigation measures are necessary.	Less than significant
<p><b><u>CUMULATIVE CONSIDERABLE INCREASE OF CRITERIA POLLUTANT IN NONATTAINMENT AREA – CONSTRUCTION (REGIONAL):</u></b></p> <p>With implementation of MM-AQ-1, the Project's construction daily emissions of the criteria and precursor pollutants (VOC, NOX, CO, SOX, PM10, and PM2.5) would not exceed the SCAQMD numeric thresholds. Therefore, the Project's potentially significant regional criteria pollutant construction emission impacts would be reduced to a less than significant level.</p>	No project design features are applicable.	<p><b>MM-AQ-1: Construction Measures:</b> The Project shall utilize off-road diesel-powered construction equipment that meets the CARB and USEPA Tier 4 Final off-road emissions standards for equipment rated at 50 hp or greater during Project construction. To the extent possible, pole power shall be made available for use with</p>	Less than significant with mitigation

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.	
<p><b><u>CUMULATIVE CONSIDERABLE INCREASE OF CRITERIA POLLUTANT IN NONATTAINMENT AREA – OPERATION (REGIONAL):</u></b></p> <p>With implementation of PDF-AQ-1, the Project's operational daily emissions for the criteria and precursor pollutants (VOC, NOX, CO, SOX, PM10, and PM2.5) would not exceed the SCAQMD numeric thresholds. Therefore, the Project's potential regional criteria pollutant operational emission impacts would be less than significant.</p>	<p><b>PDF-AQ-1: Green Building Measures.</b> The Project will be designed and operated to exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.</p> <p>Green building measures will include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• The Project will be designed to optimize energy performance and reduce building energy cost by a minimum of 5 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016).</li> <li>• The Project will be designed to optimize energy performance and reduce building energy cost by</li> </ul>	No mitigation measures are necessary.	Less than significant



Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent.</p> <ul style="list-style-type: none"> <li>• The Project will provide a minimum of 30 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the Project Site.</li> <li>• The Project will reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption as required in LAMC Section 99.04.304. Reductions would be achieved through drought-tolerant/California native plant species selection, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), and/or smart irrigation systems (e.g., weather-based controls).</li> <li>• The Project will reduce indoor potable water use by a minimum of 20 percent compared to baseline or standard water consumption as defined in LAMC Section 99.04.303 by installing water fixtures that exceed applicable standards.</li> </ul>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<ul style="list-style-type: none"> <li>The Project would not include fireplaces in the residential buildings.</li> </ul>		
<p><b><u>SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS – LOCALIZED CONSTRUCTION EMISSIONS:</u></b></p> <p>The Project's maximum localized construction emissions would not exceed the localized thresholds for CO, NOX, PM10, and PM2.5. Therefore, the Project's localized construction emission impacts on sensitive receptors would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<p><b><u>SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS – CONSTRUCTION TAC EMISSIONS:</u></b></p> <p>The qualitative assessment as well as the health risk modeling concluded that TAC emissions from construction activities would not expose sensitive receptors to substantial TAC concentrations. Although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations.</p>	No project design features are applicable.	Refer to Mitigation Measure MM-AQ-1.	Less than significant with mitigation
<p><b><u>SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS – LOCALIZED OPERATION EMISSIONS:</u></b></p> <p>With implementation of PDF-AQ-1, the Project's maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for NOX, CO, PM10 or PM2.5.</p>	Refer to PDF-AQ-1, above.	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
Therefore, the Project's localized operational emission, impacts on sensitive receptors would be less than significant.			
<p><b><u>SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS – OPERATION TAC EMISSIONS:</u></b></p> <p>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 Project's proposed uses, 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.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<p><b><u>SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS: OPERATION CO HOTSPOTS:</u></b></p> <p>The Project would not contribute to the formation of CO hotspots. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<b>IV.C CULTURAL RESOURCES</b>			
<p><b><u>HISTORICAL RESOURCES:</u></b></p> <p>The Project does not involve construction that would demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site or reduce the integrity or significance of any historical resources adjacent to the Project Site or in the Project vicinity. All</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p>identified resources would maintain the same level of eligibility as historical resources with the Project in place. Therefore, the Project would not have significant impacts on historical resources in the Project vicinity.</p>			
<p><b><u>ARCHAEOLOGICAL RESOURCES:</u></b></p> <p>Since the Project Site has the potential to retain buried resources associated with the Bartlett residence that have at least some potential of being historic or unique archeological resources, the potential to encounter such subsurface archaeological resources during the construction of the Project is considered moderate. Due to this potential, impacts on archeological resources are considered significant prior to mitigation. Mitigation Measures MM-ARCH-1 through MM-ARCH-3 are therefore identified below to reduce potentially significant impacts to buried/unknown unique archaeological resources to a less than significant level.</p>	<p>No project design features are applicable.</p>	<p><b>MM-ARCH-1:</b> Prior to the issuance of a demolition permit, 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. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and 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</p>	<p>Less than significant with mitigation</p>

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event.</p> <p><b>MM-ARCH-2:</b> 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. An appropriate buffer area shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. 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</p>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>“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 preservation in place is not feasible, treatment 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, such as the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they</p>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>shall be donated to a local school or historical society in the area for educational purposes.</p> <p><b>MM-ARCH-3:</b> 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 of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project 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.</p>	
<p><b><u>HUMAN REMAINS:</u></b></p> <p>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</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p>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, the Project would have a less than significant impact with respect to human remains.</p>			
<b>IV.D ENERGY</b>			
<p><b><u>ENERGY DEMAND:</u></b></p> <p>The Project would implement PDF AQ-1 and PDF WS-1 and other conservation measures related to water conservation, energy conservation, landscaping, and other features consistent with the City’s Green LA Plan and the Sustainable City pLAn, as well as Project Sustainability Features that go beyond those specified by regulations such as the City’s Green Building Ordinance during construction and operation. In addition, the Project would support statewide efforts to improve transportation energy efficiency through compliance with Corporate Average Fuel Economy (CAFÉ) fuel economy standards and the Pavley and Low Carbon Fuel standards, and is located in a High Quality Transit Area to achieve a reduction in VMT better than the City and statewide averages. Therefore, the Project would not result in potentially a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.</p>	<p>Refer to PDF AQ-1 (Green Building Measures), above; and PDF WS-1 (Water Conservation Measures), PDF-NOI-1 (Generators), and PDF-GHG-3 (EV Parking), below.</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>



Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p><b><u>CONSISTENCY WITH STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY:</u></b></p> <p>The Project would implement PDFs and incorporate water conservation, energy conservation, landscaping, and other features consistent with the City's Green LA Plan and the Sustainable City pLAn, as well as Project Sustainability Features that go beyond those specified by regulations such as the City's Green Building Ordinance. Therefore, the Project would not conflict with energy conservation plans and impacts would be less than significant.</p>	Refer to PDF-AQ-1 (Green Building Measures), above; and PDF-GHG-3 (EV Parking) and PDF WS-1 (Water Conservation Measures), below.	No mitigation measures are necessary.	Less than significant
<b>IV.E GEOLOGY AND SOILS</b>			
<p><b><u>HAZARDOUS GEOLOGIC CONDITIONS:</u></b></p> <p>The Project would not cause, accelerate, or exacerbate seismic conditions or other geologic conditions on the Project Site or in its vicinity that would result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk or injury. As such, direct and indirect impacts related to surface ground rupture, strong seismic ground shaking, liquefaction, seismic-related ground failure and landslides would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<p><b><u>SOIL EROSION OR LOSS OF TOPSOIL:</u></b></p> <p>Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the California Building Code (CBC) and the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB),</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p>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 Project 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, impacts due to erosion or loss of topsoil would be less than significant with compliance with applicable code and regulatory requirements.</p>			
<p><b><u>UNSTABLE GEOLOGIC UNIT OR SOILS:</u></b></p> <p>The Project would not be developed on a geologic unit or on soil that is unstable, or that would become unstable as a result of the Project, so as to create the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts associated these geologic hazards on the Project Site would be less than significant.</p>	<p>No project design features are applicable.</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>
<p><b><u>EXPANSIVE SOILS:</u></b></p> <p>Compliance with standard construction and engineering practices (i.e., onsite 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. Thus, the Project would not be developed on expansive soils or corrosive soils as to create substantial direct or indirect risks to life or</p>	<p>No project design features are applicable.</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
property. Project impacts regarding expansive and corrosive soils would be less than significant.			
<p><b><u>PALEONTOLOGICAL RESOURCES:</u></b></p> <p>Project grading and excavation in older Quaternary Alluvium deposits have high potential to encounter fossils. Thus, impacts on paleontological resources are considered potentially significant. Therefore, Mitigation Measures MM-PALEO-1 through MM-PALEO-3 are identified to reduce this potentially significant impact to buried/unknown paleontological resources a less than significant level.</p>	No project design features are applicable.	<p><b>MM-PALEO-1:</b> Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010)<sup>1</sup> to develop and implement a paleontological monitoring program for construction excavations that would encounter the fossiliferous older Quaternary alluvium deposits (associated with sediments below five feet deep across the Project Site). The Qualified Paleontologist shall attend a pre-grade meeting to discuss a paleontological monitoring program. The Qualified Paleontologist shall supervise a paleontological monitor who shall be present during construction excavations into older Quaternary alluvium deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising</p>	Less than significant with mitigation

<sup>1</sup> Society of Vertebrate Paleontology, "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" (SVP, 1995/2010), available at: [http://vertpaleo.org/The-Society/Governance-Documents/SVP\\_Impact\\_Mitigation\\_Guidelines.aspx](http://vertpaleo.org/The-Society/Governance-Documents/SVP_Impact_Mitigation_Guidelines.aspx). Accessed June 2019.

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older Quaternary alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified Paleontologist.</p> <p><b>MM-PALEO-2:</b> If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the qualified Paleontologist's discretion and to</p>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation of the find. If preservation in place is not a feasible treatment measure, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from the Project Site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Los Angeles County Natural History Museum, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.</p> <p><b>MM-PALEO-3:</b> Prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the</p>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	
<b>IV.F GREENHOUSE GAS EMISSIONS</b>			
<p><b><u>GREENHOUSE GAS EMISSIONS – COMPLIANCE WITH APPLICABLE PLANS, POLICIES, AND REGULATIONS:</u></b></p> <p>With implementation of PDFs AQ-1, and PDF-GHG-1 to PDF-GHG-3, the Project would be consistent with applicable regulatory plans and policies to reduce GHG emissions. The Project would be consistent with GHG reduction actions and strategies contained in CARB's 2017 Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, and the City's Green New Deal, and Green Building Code. The Project's consistency with these applicable regulatory plans, policies, codes and actions to reduce GHG emissions, along with its incorporation of PDFs discussed in this and other sections of this Draft EIR, particularly PDF-AQ-1 (Green Building Features), would substantially minimize the Project's GHG emissions. Accordingly, the Project would also not generate GHG emissions either directly or indirectly, that would have a</p>	<p>Refer to PDF-AQ-1, above.</p> <p><b>PDF-GHG-1: GHG Emission Offsets.</b> The Project will provide or obtain GHG emission offsets as required in the Project's Environmental Leadership Development Project certification and related documentation pursuant to the <i>Jobs and Economic Improvement Through Environmental Leadership Act</i>.</p> <p><b>PDF-GHG-2:</b> At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring</p>	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
significant impact on the environment. The Project's GHG emission impacts would be less than significant.	<p>schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.</p> <p><b>PDF-GHG-3:</b> At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.</p>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<b>IV.G HYDROLOGY AND WATER QUALITY</b>			
<p><b><u>CONSISTENCY WITH WATER QUALITY STANDARDS AND WASTE DISCHARGE REQUIREMENTS:</u></b></p> <p>Project construction and operation would be consistent with water quality standards, including but not limited to NPDES permits/ Waste Discharge Requirements and the City's Low Impact Development (LID) ordinance and, as such, would not substantially degrade surface or groundwater quality. Impacts with respect to surface and groundwater quality would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<p><b><u>ALTERATION OF DRAINAGE PATTERNS, EROSION, OR FLOODING:</u></b></p> <p>Compliance with regulatory requirements would ensure that the Project would not 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:</p> <ul style="list-style-type: none"> <li>i. result in substantial erosion or siltation on- or off-site;</li> <li>ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</li> <li>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</li> <li>iv. impede or redirect flood flows.</li> </ul>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.



Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
As such, the Project's impacts with respect to surface water hydrology during Project construction and operation would be less than significant.			
<p><b><u>CONSISTENCY WITH WATER QUALITY CONTROL PLAN OR GROUNDWATER MANAGEMENT PLAN:</u></b></p> <p>Compliance with applicable regulations, such as SWPPP and LID regulations, would ensure that the Project would not degrade the quality of surface or groundwater and, as such, the Project would be consistent with the objectives of applicable water quality control and groundwater management plans. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<b>IV.H LAND USE AND PLANNING</b>			
<p><b><u>CONSISTENCY WITH PLANS ADOPTED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT:</u></b></p> <p>The Project, with the approval of proposed entitlements, would be substantially consistent with and would not substantially impede implementation of adopted land use plans, policies, guidance, and regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts with respect to land use plans, policies, guidelines, and regulations would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<b>IV.I NOISE AND VIBRATION</b>			
<p><b><u>INCREASE IN NOISE LEVELS IN EXCESS OF ESTABLISHED STANDARDS - CONSTRUCTION</u></b></p> <p>Construction related activity noise levels would exceed the significance thresholds at several nearby noise sensitive receptors. Therefore, impacts would be potentially significant prior to mitigation. Mitigation measures would be required. However, even with implementation of MM-NOISE-1 through MM-NOISE-2, construction noise would remain significant and unavoidable. Off-site construction noise (construction traffic noise) would not exceed threshold levels and would be less than significant.</p>	<p><b>PDF-NOI-1:</b> Generators used during the construction process will be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.</p> <p><b>PDF-NOI-2:</b> The Project will not use impact pile drivers and will not allow blasting during construction activities.</p>	<p><b>MM-NOI-1: Construction Noise Barriers.</b> The Project shall provide a temporary 15-foot tall construction noise barriers (i.e., wood, sound blanket) between the Project construction site and residential development along the entire south, west, and east boundaries of the Project Site, achieving a performance standard of a 15 dBA noise level reduction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure. The temporary noise barriers shall be used during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent.</p> <p><b>MM-NOI-2: Equipment Noise Control.</b> The Project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment.</p> <ul style="list-style-type: none"> <li>• The contractor(s) shall not use blasting, jack hammers or pile drivers. The contractor(s) shall use only electric power crane(s), and shall use other</li> </ul>	Significant and unavoidable

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>electric equipment if commercially available.</p> <ul style="list-style-type: none"> <li>• The contractor(s) shall limit unnecessary idling of equipment on or near the site.</li> <li>• The contractor(s) shall place noisy construction equipment as far from the Project Site edges as practicable.</li> <li>• The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. For example, absorptive mufflers are generally considered commercially available, state-of-the-art noise reduction for heavy duty equipment.<sup>2</sup> The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.</li> </ul>	

<sup>2</sup> United muffler Corp: <https://www.unitedmuffler.com/> P) 866-229-3402; Auto-jet Muffler Corp: <http://mandrelbending-tubefabrication.com/index.php>, P)800-247-5391; AP Exhaust Technologies: <http://www.apexhaust.com/>, P)800-277-2787

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p><b><u>INCREASE IN NOISE LEVELS IN EXCESS OF ESTABLISHED STANDARDS - OPERATION</u></b></p> <p>The Project would generate noise from various sources including, automobile movement noise in the parking structures, outdoor/open space noise, loading dock and refuse service areas, emergency generator, and on-site mechanical equipment. Of these, the operation of an emergency generator could exceed applicable noise thresholds at nearby noise sensitive receptors. Also, composite noise impacts could exceed applicable noise thresholds at nearby noise sensitive receptors. Therefore, impacts would be potentially significant prior to mitigation. Mitigation measures would be required. With implementation of MM-NOISE-5, noise from operation of the emergency generator would reduce noise impacts from the generator and composite noise levels to a less than significant level.</p>	No project design features are applicable.	<p><b>MM-NOI-5: Emergency Generator:</b> The Project shall install a sound enclosure and/or equivalent noise-attenuating features (i.e., mufflers) for the emergency generator that will provide approximately 25 dBA noise reduction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.</p>	Less than significant with mitigation
<p><b><u>EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS - CONSTRUCTION:</u></b></p> <p>Construction of the Project would generate groundborne construction noise and vibration during site clearing, grading and shoring. Construction activities immediately adjacent to the property line could produce groundborne vibration velocities that exceed applicable vibration thresholds. As such, the Project's impact related to groundborne vibration during construction is considered to be potentially significant. Mitigation is required. Implementation of MM-NOISE-3 and MM-NOISE-4 would reduce construction groundborne noise and vibration. However, because impacts would be close to and potentially exceed thresholds, and for</p>	No project design features are applicable.	<p><b>MM-NOI-3:</b> Heavy construction equipment such as a large dozer, a large grader, and a large excavator shall not operate within 15 feet from the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue (R3). Small construction equipment such as a small dozer, a small excavator, and a small grader shall be permitted to operate within 15 feet from the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue (R3). The Applicant shall designate a</p>	Significant and Unavoidable

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
MM-NOISE-4 requiring consent of adjacent property owners, who may not agree, impacts are concluded to be significant and unavoidable.		<p>construction relations officer to serve as a liaison with the nearest single-family residential buildings (R3). The liaison shall be responsible for responding to concerns regarding construction groundborne vibration within 24 hours of receiving a complaint. The liaison shall ensure that steps will be taken to reduce construction groundborne vibration levels as deemed appropriate and safe by the on-site construction manager. Such steps could include the use of vibration absorbing barriers, substituting lower groundborne vibration generating equipment or activity, rescheduling of high groundborne vibration-generating construction activity, or other potential adjustments to the construction program to reduce groundborne vibration levels at the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue (R3).</p> <p><b>MM-NOI-4:</b> Prior to start of construction, the Project Applicant shall retain the services of a licensed building inspector, or structural engineer, or other qualified professional as approved by the City, to inspect and document (video and/or</p>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>photographic) the apparent physical condition of the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3), including but not limited to the building structure, interior wall, and ceiling finishes.</p> <p>The Project Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a groundborne vibration monitoring program capable of documenting the construction-related groundborne vibration levels at each residence during demolition, excavation, and construction of the parking garages. The groundborne vibration monitoring program shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. Groundborne vibration data shall be stored on a two-second interval. The program shall also be programmed for two preset velocity levels: a warning level of 0.15 inch/second PPV and a regulatory level of 0.2 inch/second PPV. The program shall also provide real-time alerts when the groundborne vibration</p>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>levels exceed the two preset levels.</p> <ul style="list-style-type: none"> <li>The groundborne vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities for approval.</li> <li>In the event the warning level (0.15 inch/second PPV) is triggered, the contractor shall identify the source of groundborne vibration generation and provide feasible steps to reduce the groundborne vibration level such as halting/staggering concurrent activities or utilizing lower vibratory techniques.</li> <li>In the event the regulatory level (0.2 inch/second PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the affected residences and visually inspect the affected residences for any damage. Results of the inspection must be logged. The contractor shall identify the source of groundborne vibration generation and implement feasible steps to reduce the groundborne vibration level</li> </ul>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>such as staggering concurrent activities or utilizing lower vibratory techniques. Construction activities may continue upon implementation of feasible steps to reduce the groundborne vibration level.</p> <ul style="list-style-type: none"> <li>• In the event damage occurs to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction groundborne vibration, such materials shall be repaired to the same or better physical condition as documented in the pre-construction inspection and video and/or photographic records.</li> </ul>	
<p><b><u>EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS - OPERATION:</u></b></p> <p>Groundborne noise and vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.</p>	<p>No project design features are applicable.</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant</p>



Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<b>IV.J POPULATION AND HOUSING</b>			
<p><b><u>POPULATION GROWTH:</u></b></p> <p>The Project would not induce substantial population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Thus, impacts would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<p><b><u>DISPLACEMENT OF SUBSTANTIAL NUMBERS OF PEOPLE REQUIRING REPLACEMENT HOUSING ELSEWHERE:</u></b></p> <p>The Project would not displace substantial numbers of existing people or housing such that the unplanned construction of replacement housing elsewhere would be required. Further, the Project would comply with the applicable provisions of the City's Rent Stabilization Ordinance (RSO). In addition, impacts from the demolition of existing housing would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant
<b>IV.K.1 FIRE PROTECTION SERVICES</b>			
<p><b><u>FIRE PROTECTION:</u></b></p> <p>Project construction and operation would not result in the need for new or physically altered fire facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios, response times or objectives. The Project's impacts on fire protection and emergency medical services would be less than significant.</p>	<p>Refer to PDF-TRAF-1, below.</p> <p><b>PDF-FIRE-1:</b> The following Voluntary Fire and Emergency Medical Measures will be provided for the long term operations of the Project:</p> <ul style="list-style-type: none"> <li>• Owner supplied automated external defibrillators (AED's) will be provided on selected floors to</li> </ul>	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>be used by on-site security as necessary. Security personnel will be fully trained on the use and operation of the AED's; and</p> <ul style="list-style-type: none"> <li>First aid training will be made available and encouraged for all building occupants, accessible on-line.</li> </ul>		
<b>IV.K.2 POLICE PROTECTION</b>			
<p><b><u>POLICE PROTECTION:</u></b></p> <p>Project construction and operation would not result in the need for new or physically altered police facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios, response times or objectives. The Project's impacts on police protection services would be less than significant.</p>	<p>Refer to PDF-TRAF-1, below.</p> <p><b>PDF-POL-1:</b> During construction, the Project Applicant will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting focused on the building site (no direct glare or light spill-over on neighboring properties), and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction activities, the Contractor will document the security measures;</p>	<p>No mitigation measures are necessary.</p>	<p>Less than significant.</p>

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>and the documentation will be made available to the Construction Monitor.</p> <p><b>PDF-POL-2:</b> During operation, the Project will incorporate a 24 hour/seven-day security program to ensure the safety of its residents and site visitors. The Project's security will include, but not be limited to, the following design features:</p> <ul style="list-style-type: none"> <li>• Installing and utilizing a 24-hour security camera network throughout the underground parking structures, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage shall be maintained for at least 30 days, and such footage shall be provided to the LAPD, as needed;</li> <li>• Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed;</li> <li>• Maintaining staff on-site, including at the lobby concierge desk and within the car valet areas;</li> <li>• Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an</li> </ul>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>electronic key fob specific to each user;</p> <ul style="list-style-type: none"> <li>• Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but 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 the property; and</li> <li>• Maintaining unrestricted access to commercial/restaurant uses during business hours, with public access (except for authorized persons) prohibited after the businesses have closed.</li> </ul> <p><b>PDF-POL-3: Landscaping.</b> Project landscaping will be designed so as not to impede visibility.</p> <p><b>PDF-POL-4: Participation in Community Crime Prevention Efforts.</b> The Project residential association and commercial uses will participate in any community crime prevention efforts (e.g., Neighborhood Watch) that may be active in the Project area.</p> <p><b>PDF-POL-5: Provision of Project Diagrams to LAPD.</b> Prior to the issuance of a Certificate of Occupancy, the Project Applicant will submit a diagram of the Project</p>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	Site to the Los Angeles Police Department West Bureau Commanding Officer that includes access routes and any additional information requested by the Los Angeles Police Department as necessary to facilitate police response.		
<b>IV.K.3 SCHOOLS</b>			
<p><b><u>SCHOOLS:</u></b></p> <p>Project implementation could require new or expanded school facilities. 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 in question are at capacity or not. Pursuant to California Government Code Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, the Project's impacts to school facilities and services would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<b>IV.K.4 PARKS AND RECREATION</b>			
<p><b><u>PARKS AND RECREATION:</u></b></p> <p>Construction and operation of the Project would not cause or accelerate substantial physical deterioration of off-site public parks and recreational facilities, and would not create demand that would necessitate the provision of new or physically altered facilities, the construction of which would</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
cause significant adverse physical impacts. Therefore, impacts on parks and recreational facilities would be less than significant.			
<b>IV.K.5 LIBRARIES</b>			
<b><u>LIBRARIES:</u></b> Project construction and 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.	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<b>IV.L TRANSPORTATION AND TRAFFIC</b>			
<b><u>CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES:</u></b> The Project would not conflict with adopted policies, plans, or programs related to transportation. Therefore, impacts would be less than significant.	Refer to PDF-GHG-1 and PDF-GHG-2, above.  <b>PDF-TRAF-1: Construction Traffic Management Plan.</b> A detailed Construction Traffic Management Plan including street closure information, detour plans, haul routes, and staging plans will be prepared and submitted to the Los Angeles Department of Transportation for review and approval. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The	No mitigation measures are necessary.	Less than significant

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities of the Project and other projects in the vicinity of the Project Site, if any, and will include, but not be limited to, the following elements as appropriate:</p> <ul style="list-style-type: none"> <li>• Advanced notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Prohibition of construction-related vehicles, including construction worker parking on nearby residential streets.</li> <li>• Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. In the event of a lane or sidewalk closure, a worksite traffic control plan shall route traffic or pedestrians around any such lane or sidewalk closures.</li> <li>• Maintenance of safe and convenient routes for pedestrians and bicyclists through such measures as alternate routing and protection barriers where appropriate, including along all</li> </ul>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>identified Los Angeles Unified School District (LAUSD) pedestrian routes to the nearby school.</p> <ul style="list-style-type: none"> <li>• Scheduling of construction-related deliveries, haul trips, worker trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to the nearby school.</li> <li>• Provision of detour plans to address temporary road closures during construction. Coordination of temporary road closures so as to occur outside of peak hours.</li> <li>• Minimize queueing of haul trucks and construction-related vehicles on adjacent streets.</li> <li>• Advanced notification of temporary parking removals and duration of removals.</li> <li>• Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.</li> </ul> <p><b>PDF-TRAF-2: Pedestrian Safety Plan.</b> The Project Applicant will plan construction and construction staging so as to maintain pedestrian access, including Safe Routes to Schools, on adjacent sidewalks</p>		



Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
	<p>throughout all construction phases. The Project Applicant will maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities will be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways will be provided where pedestrians are exposed to potential injury from falling objects. The Project Applicant will keep sidewalks open during construction except when it is absolutely required to close or block the sidewalks for construction staging. Sidewalks will be reopened as soon as reasonably feasible, taking construction and construction staging into account. In the event that multiple projects are under construction in the area simultaneously that would affect the same sidewalk(s), the Project Applicant will coordinate with LADOT to ensure pedestrian safety is maintained.</p>		

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p><b><u>VEHICLE MILES TRAVELED (VMT):</u></b></p> <p>The Project would result in a potentially significant impact for household VMT and a less than significant impact for the work VMT. However, with implementation of Mitigation Measure TRAF-1, potentially significant impacts would be reduced to a less than significant level.</p>	<p>No project design features are applicable.</p>	<p><b>MM-TRAF-1: Transportation Demand Management Program.</b></p> <p>The Project Applicant shall prepare and implement a comprehensive Transportation Demand Management (TDM) Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The TDM Program shall be subject to review and approval by the Department of City Planning and LADOT. A covenant and agreement shall be implemented to ensure that the TDM Program shall be maintained. The exact measures to be implemented shall be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The TDM Program shall ensure that the Project VMT would be below the applicable VMT threshold(s) established in the Transportation Assessment Guidelines through such means that could include monitoring or reporting, as required by the City. The strategies in the TDM Program shall include at a minimum, the following:</p> <ul style="list-style-type: none"> <li>• Unbundled Parking: Provision of unbundled parking for residents (i.e., parking space</li> </ul>	<p>Less than significant with mitigation.</p>

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
		<p>is leased separately from dwelling units); and</p> <ul style="list-style-type: none"> <li>Promotions and Marketing: Employees and residents shall be provided with materials and promotions encouraging use of alternative modes of transportation. This type of campaign would raise awareness of the options available to people who may never consider any alternatives to driving.</li> </ul> <p>In addition, the TDM could include measures such as:</p> <ul style="list-style-type: none"> <li>Short-term car rentals;</li> <li>Incentives for using alternative travel modes (such as transit passes);</li> <li>Guaranteed ride home program for employees;</li> <li>Parking incentives and administrative support for formation of carpools/vanpools; and/or</li> <li>Participation as a member in the future Hollywood Transportation Management Organization (TMO), when operational. When the Hollywood TMO becomes operational, the Hollywood TMO's services may replace some of the in-house TDM services where applicable.</li> </ul>	

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p><b><u>ROADWAY HAZARDS:</u></b></p> <p>The Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<p><b><u>EMERGENCY ACCESS:</u></b></p> <p>During construction, emergency access would be maintained in and around the Project Site with implementation of a Construction Management Plan as required by PDF-TRAF-1. Implementation of PDF-TRAF-1 would ensure emergency access impacts during construction are less than significant. During operation, with review and approval of Project Site access and circulation plans by the LAFD, the Project would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Operational impacts regarding emergency access would be less than significant.</p>	Refer to PDF-TRAF-1.	No mitigation measures are necessary.	Less than significant.
<b>IV.M TRIBAL CULTURAL RESOURCES</b>			
<p><b>TRIBAL CULTURAL RESOURCES:</b></p> <p>No known tribal cultural resources have been identified within the Project Site or vicinity. However, in the unlikely event that buried tribal cultural resources are encountered during construction, the Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent Tribal cultural resource discoveries. The Project's impacts to tribal resources are, therefore, considered to be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<b>IV.N.1 UTILITIES AND SERVICE SYSTEMS - WATER, WASTEWATER AND SOLID WASTE</b>			
<p><b><u>WATER AND WASTEWATER INFRASTRUCTURE:</u></b></p> <p>Construction and operation of the Project would not exceed the available capacity within the water and wastewater distribution infrastructure that would serve the Project Site. During Project construction, minor off-site construction impacts associated with the installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water or wastewater service. During operation, fire flow (water) would exceed minimum residual water pressure required for fire-fighting purposes. Therefore, the water system would have available capacity to meet the domestic water needs of the Project. Impacts with respect to water infrastructure would be less than significant.</p>	Refer to PDF-TRAF-1.	No mitigation measures are necessary.	Less than significant.
<p><b><u>WATER SUPPLY:</u></b></p> <p>With implementation of PDF-WS-1, the Project would be consistent with required City ordinances including mandatory and voluntary efforts to reduce potable water consumption, which efforts will be confirmed during site-plan review for the Project and would contribute to conservation goals established in the adopted Los Angeles Department of Water and Power (LADWP) and Metropolitan Water District (MWD) Urban Water Management Plans (UWMPs). Given that LADWP would be able to meet the water demand generated by the Project, impacts associated with construction and long-term operation of the Project on water supply would be less or than significant.</p>	<p><b>PDF-WS-1:</b> Water conservation measures will include, but not be limited to: installation of waterless urinals; 1.75 gpm for shower heads; high efficient/demand water heater system; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible.</p>	No mitigation measures are necessary.	Less than significant.

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p><b><u>WASTEWATER TREATMENT CAPACITY:</u></b></p> <p>The Hyperion Water Reclamation Plant (HWRP) has adequate treatment capacity to serve the Project. In addition, the City's existing sewer system has adequate capacity to accommodate the anticipated wastewater generated by the Project. Moreover, the Project would be required to construct or otherwise implement any system upgrades that may be necessary to meet its demand, if necessary, as to be finally determined by the City when the Project seeks building permits. Therefore, LASAN through its existing sewer infrastructure system and HWRP have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Less than significant impacts regarding wastewater treatment capacity would occur.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<p><b><u>LANDFILL CAPACITY:</u></b></p> <p>Project-generated waste from both construction and operations 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, impacts on solid waste disposal from Project operations would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance After Mitigation
<p><b><u>CONSISTENCY WITH STATE AND LOCAL WASTE STATUTES:</u></b></p> <p>The Project's commitment to LEED certification and incorporation of recycling facilities to promote waste diversion from landfills would not conflict with the City of Los Angeles Source Reduction and Recycling Element, the City of Los Angeles General Plan Framework Element or Curbside Recycling Program. Impacts regarding consistency with the applicable state and local statutes, ordinances, policies, and objectives would be less than significant.</p>	No project design features are applicable.	No mitigation measures are necessary.	Less than significant.
<b>IV.N-2 UTILITIES AND SERVICE SYSTEMS - ENERGY INFRASTRUCTURE</b>			
<p><b><u>UTILITIES AND SERVICE SYSTEMS - ENERGY INFRASTRUCTURE:</u></b></p> <p>Construction and operation of the Project 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. Impacts would be less than significant during construction and operation.</p>	Refer to PDF-NOI-1 PDF-AQ-1, above.	No mitigation measures are necessary.	Less than significant.
SOURCE: ESA, 2020.			

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# Chapter I

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## Introduction

### 1. Purpose of The Draft EIR

This Draft Environmental Impact Report (Draft EIR or EIR) has been prepared for the proposed 6220 West Yucca Street Project (the Project). The Project would redevelop an approximately 1.16-acre (net area) property on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue, generally referenced as 6220 West Yucca Street, (Project Site) with a mixed-use residential, hotel, and commercial/restaurant project. The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts that could result from the Project. The City of Los Angeles (City) is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code Sections 21000-21189 et seq.), and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387 et seq.). The principal State CEQA Guidelines sections governing the content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15161 (Project EIR).

The City is responsible for processing and evaluating the Project pursuant to CEQA Section 21067. Prior to deciding whether or not to approve the Project, the City will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including, without limitation, the Initial Study and the Final EIR. If the Project is approved, the Certified EIR, including both the Draft EIR and the Final EIR, will be used in connection with all other permits and all other approvals necessary for the construction and operation of the Project. That is, the Certified EIR will be used by the City's Department of City Planning, Department of Building and Safety, Department of Transportation (LADOT), and Department of Public Works, including the Bureaus of Engineering and Sanitation, Cultural Heritage Commission, City Council, and other responsible public agencies that must approve activities undertaken with respect to development of the Project.

In accordance with the requirements of CEQA and the State CEQA Guidelines, this Draft EIR provides specific information regarding the significant and potentially significant environmental effects of the Project, and identifies ways to minimize these effects through mitigation measures or reasonable alternatives to the Project. Those effects that cannot be mitigated to a level considered less than significant are considered to be significant and unavoidable. In accordance with Public Resources Code Section 21081 and Section 15093(b) of the State CEQA Guidelines, if a public agency approves a project

that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts, where significant 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 Draft EIR analyzes the environmental effects of the Project to the degree of specificity appropriate to the Project activities, as required under Section 15146 of the State CEQA Guidelines. This analysis considers the actions associated with the Project, to determine the short-term and long-term effects associated with their implementation. This EIR discusses both the direct and indirect impacts of this Project, as well as any cumulative impacts associated with other past, present, and reasonably foreseeable future related 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 potentially significant adverse effects.

## **2. Project Summary**

The Project Site is located within the Hollywood community of the City of Los Angeles, and is currently improved with one single-family residence, one duplex with a detached garage, one studio apartment over the detached garage, and three, two-story apartment buildings with associated carports and paved surface parking areas, all of which would be demolished and removed to allow for development of the Project. Overall, the Project Site currently contains a total of 43 multi-family units (duplex = 2 units; 1 studio apartment over duplex garage; apartment buildings = 40 units) and one single-family residence. Thus, there are a total of 44 existing residential units currently on the Project Site. Forty-three (43) of these existing units are subject to the City’s Rent Stabilization Ordinance (RSO).<sup>1</sup> As discussed below, the Project would meet applicable RSO requirements.

### **a) Original Project**

As discussed below, an Initial Study and Notice of Preparation (NOP) were circulated for public review in November 2015. The purpose of the NOP was to provide notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. As originally conceived, the Project design included the development of two buildings (Buildings 1 and 2). Building 1 was originally designed to occupy the majority of the Project Site, with up to 32-stories, atop a six-level podium structure with one semi-subterranean level (P1 Level); it included a mix of residential, hotel, and commercial/restaurant uses. Building 2 was designed to be 6-stories with only residential uses. Overall, these proposed buildings included 191 multi-family residential units (including 39 affordable units), 260 hotel rooms,

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<sup>1</sup> The RSO is contained in LAMC Chapter XV.

approximately 6,980 square feet of commercial/restaurant uses (P1 and Level 1), and a total of 372,450 square feet of floor area. Parking for all proposed uses was to be provided within a six-level (one semi-subterranean level) parking structure housed within the podium structure of Building 1 (referred to hereafter as the “Original Project”).

Since preparation of the Initial Study and NOP, however, the Original Project has been reduced in overall size and redesigned to create the current Project. Generally, Building 1 has been reduced from 32 stories to 20 stories and Building 2 has been reduced from 6 stories to 3 stories. The Project still proposes a mix of residential, commercial and hotel uses. However, as compared to the Original Project, the current Project includes 210 multi-family units (19 more units); 12,570 square feet of commercial/restaurant uses (5,590 square feet more commercial space); and 136 hotel rooms (124 fewer hotel rooms). The current Project’s overall floor area of 316,948 square feet is 55,502 square feet smaller than the Original Project’s 372,450 square feet. **Table 1-1, Original Project Versus Current Project**, provides a comparison of the Original Project to the current Project.

**TABLE 1-1**  
**ORIGINAL PROJECT VERSUS CURRENT PROJECT**

	Original Project	Current Project
Max Height	Along Yucca Bldg. 1 = ~360 feet (32-stories) Bldg. 2 = ~75 feet (6-stories)	Along Yucca Bldg. 1 = ~250 feet (20-stories) Bldg. 2 = ~34 feet (3-stories)
Residential (MF Units)	191	210
Commercial/Restaurant SF	6,980	12,570
Hotel Rooms	260	136
New Parking Required	447	435
New Parking Proposed	456	436
Floor Area (Gross SF)	372,450	316,948
FAR	<b>8.1:1</b>	<b>6.6:1</b>
SF = square feet; FAR = Floor Area Ratio Source: ESA, 2019.		

The conceptual design of the Original Project included a modern design for both buildings that largely featured glass clad exterior walls for the residential/hotel components and

part of the parking podium. While the current Project also features a modern design for Building 1, Building 2 has been designed in a contemporary adaption of the Craftsman style so that its scale and height at 3 stories, stepped massing with sloped hip roofs, natural materials, muted color scheme and details create a transition from the Project to the single-family homes situated in the Vista Del Mar Carlos Historic District.

The Initial Study for the Original Project concluded that the Project would have no impacts or that its potential impacts would be less than significant regarding: Air Quality (odors only); Agriculture and Forestry Resources; Biological Resources; Geology and Soils (septic tanks or alternative waste water disposal systems); Hazards and Hazardous Materials; Hydrology and Water Quality (100-year flood hazards and seiche, tsunami and mudflow hazards); Land Use and Planning (physical division of an established community); Noise (airport noise); and Mineral Resources, and that, as a result, no further analysis of these environmental topics in an EIR was required.

These same conclusions apply to the current Project. Like the Original Project, the Project would not include any uses that would create adverse odor impacts. The Project Site does not contain any agriculture/forestry resources or mineral resources, thus, no impacts would occur under either the Original Project or the current Project. Regarding biological resources, both the Original Project and current Project would remove all trees from the Project Site and replace them per the same mitigation measures identified in the Initial Study. Otherwise, no significant biological resources exist on the Project Site. Regarding septic tanks or alternative waste water disposal systems, neither the Original Project or current Project would utilize such systems, thus, no impacts would occur. Regarding hazardous materials, both the Original Project and the current Project would remove existing built features from the Project Site and excavate soils with the same potential for hazardous materials impacts. All hazardous materials would be removed, transported or disposed of in accordance applicable regulatory requirements in a similar manner under both the Original Project and the current Project. The Project Site is not subject to 100-year flood hazards or seiche, tsunami and mudflow hazards, thus, no impacts would occur in these regards. Both the Original Project and the current Project would be an infill project occupying the entirety of the Project Site, with neither physically dividing an established community. Because the Project Site is not located near an airport, no significant airport-related noise would occur. Thus, the impact findings for the Original Project relative to impact categories described above are valid for the current Project.

The Initial Study for the Original Project also concluded that the EIR would analyze the following environmental issue areas, which have the potential for significant impacts (other than as noted above): Aesthetics, Air Quality, Cultural Resources, Geology/Soils. Greenhouse Gas Emissions, Hydrology/Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Traffic, and Utilities/Service /Systems. Consistent with the Initial Study, the Draft EIR includes analyses of all of these issue areas for the current Project.

Because the current Project as now designed is smaller in size and scale than the Original Project, its environmental impacts are generally proportionately less than, or similar to, those estimated in the Initial Study. The Original Project and the current Project both have a construction schedule of approximately two years. As both projects would require excavation on the Project Site, maximum daily construction equipment use and intensity would be relatively similar under both projects. As such, maximum worst-case daily construction-related impacts (i.e., traffic, air quality and noise) would be generally similar. With regard to operational impacts, traffic (or trip) generation is a key component as it generally correlates to the extent of operational traffic, noise and air quality impacts. Compared to the Original Project, the current Project includes approximately 80 percent more commercial space and 10 percent more residential units, but these increases (in traffic) are generally offset by the considerable reduction in hotel rooms, from 260 to 136 rooms (nearly a 50 percent reduction). Overall, the resulting daily traffic and peak hour traffic volumes, and associated impacts, would not be substantially different under the two projects. Regardless, the EIR for the current Project addresses all of the potentially significant impacts identified in the Initial Study. Furthermore, the Project Site's physical conditions have remained generally unchanged since preparation of the Initial Study.

The current Project would still require the zone and height district change discretionary approvals as stated in the NOP. However, as the Project no longer proposes to include affordable units, the Project is no longer requesting a density bonus or increases in allowable floor area ratio (FAR) above what would be allowed per the Project Site's proposed zoning designations (with a Conditional Use Permit for FAR Averaging per LAMC Section 12.24-W.19).

Changes in the CEQA Guidelines Appendix G Checklist subsequent to the circulation of the Initial Study include additional questions related to wildfire hazard and construction impacts of electric power, natural gas, and telecommunications facilities. Questions related to wildfire apply to sites located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and would not be applicable to the Project Site. The issue of wildfire is addressed in greater detail in Chapter 6 of this Draft EIR. Also, the construction analyses provided throughout the Draft EIR takes into consideration the construction of all components of the Project, including the installation of and changes in utility lines. The Project area is currently urbanized and, with the exception of minor upgrades or any required under-grounding of power lines, no new service lines to the area would need to be developed. This issue is further summarized in Chapter 6 of this Draft EIR.

A more detailed overview of the Project evaluated in this Draft EIR is provided below.

## **b) The Project**

The Project would consist of two buildings, Buildings 1 and 2. Building 1 (including 20 stories at a height of up to ~255 feet as measured from the P1 Level along Argyle Avenue, the lowest surface point) would occupy the majority of the Project Site. The six-level podium parking structure would include two entirely subterranean levels (P3 and P2 Levels); two semi-subterranean levels (P1 and L1 Levels – due to site's sloping topography); and two entirely above ground levels (L2 and L3). Levels P2 and P3 would contain only parking. Level P1 would include a 1,400 square foot restaurant at the corner of Argyle Avenue and Yucca Street, with the remainder of P1 containing parking. Level L1 is considered the ground level as it primarily fronts Yucca Street. Level L1 would include a 3,270 square foot restaurant and 3,450 square foot commercial space fronting Yucca Street. L1 would also include meeting space (4,600 square feet), back of house space (4,000 square feet) and a lobby/leasing/lounge area serving as the primary entryway into the building. Limited parking would also be available on Level L1. Levels L2 and L3 would contain parking only. Atop Level L3 (the highest podium level), Building 1 would include Levels 4 through 20. Level 4 would include residential units, a 1,320 square foot spa facility for hotel guests only, as well shared (hotel and residential) features that include a 4,450 square foot restaurant/bar with outdoor dining, a pool/spa deck, a fitness center with adjacent outdoor synthetic lawn/workout space, and landscaped courtyard with seating and lounge spaces. Hotel rooms would be located on Levels 5 to 8; and residential units on Levels 9 through 20. Building 1 would also include a pool/roof garden and bar on Level 20.

Building 2, located at the southwest corner of Yucca Street and Vista Del Mar Avenue, would include three residential levels over a 2-story podium parking structure, which would include one subterranean parking level (P2 Level) and one semi-subterranean parking level (P1 Level). Thus, Building 2 would rise up to 47 feet above ground along the southernmost point along Vista Del Mar Avenue and to 34 feet above ground along Yucca Street. Building 2 would consist of only residential uses.

Overall, the Project (inclusive of both buildings) would include approximately 227,413 gross square feet of residential floor area within its 210 multi-family residential units, and common areas and corridors; approximately 76,965 gross square-feet of hotel floor area with approximately 136 hotel rooms; and approximately 12,570 square feet of commercial/restaurant floor area. The total development would include approximately 316,948 gross square feet of residential, hotel and commercial/restaurant uses for purposes of floor area calculations, resulting in a floor-area ratio (FAR) of 6.6:1. The parking structure within Building 1 would include 415 parking spaces (311 for residential uses, 79 for hotel uses, and 25 for commercial/restaurant uses). The parking structure within Building 2 would include 21 parking spaces for residential uses.

The Project Site currently contains a total of 44 existing residential units that would be demolished as part of the Project. Forty-three (43) of these existing units are subject to the City's Rent Stabilization Ordinance (RSO).<sup>2</sup> The RSO includes local regulations that implement the Ellis Act, a State law that regulates the transition of certain rental units to other uses.<sup>3</sup> Under the RSO, project applicants are required to provide relocation assistance to any existing tenants of RSO units that are replaced. For such tenants, applicants are required to provide relocation assistance in the form of a specified monetary payment set by the RSO that is meant to cover relocation expenses. In compliance with these requirements, existing tenants on the Project Site will be provided relocation assistance as required by the RSO. The RSO also imposes replacement unit requirements where RSO units are replaced.<sup>4</sup> To comply with these requirements, the Project would provide 100 percent of its 210 residential dwelling units as RSO units.

Project construction may begin as early as 2020, with construction activities ongoing for approximately two years. Full build-out and occupancy could occur as early as 2022, but would be dependent on final construction timing which would determine the full build-out year.

Discretionary actions that would be required for development of the Project are anticipated to include the following: Zone Change and Height District Change; Site Plan Review; Conditional Use Permit for FAR Averaging; Conditional Use Permit to allow hotel uses within 500 feet of residential zone; Master Conditional Use Permit to permit alcoholic beverages and live entertainment/dancing; Conditional Use Permit for a major development project and relief from applicable area regulations to allow the Project to utilize a 6.6:1 FAR; Findings of consistency with the Hollywood Community Plan, and objectives in the Hollywood Redevelopment Plan Section 506.2.3, related to an increase in the floor area ratio; Concurrent consideration under the Multiple Approvals Ordinance of all entitlement requests; Development Agreement; Owner Participation Agreement; Vesting Tentative Tract Map; Haul Route Permit; other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, waivers of dedication requirements, demolition permits, grading permits, excavation permits, foundation permits, and building permits; and other entitlements and approvals as may be required.

Although not specifically required under CEQA, the Project would voluntarily meet the requirements of the *Jobs and Economic Improvement Through Environmental Leadership Act*, which would allow the Project to qualify for streamlined environmental review under CEQA. The *Jobs and Economic Improvement Through Environmental Leadership Act* requires, among other things, the Project, upon completion to qualify for LEED Silver Certification, be located on an infill site, and not result in any net additional greenhouse gas (GHG) emissions as determined by the Executive Director of the

<sup>2</sup> The RSO is contained in LAMC Chapter XV.

<sup>3</sup> Cal. Gov't Code §§ 7060 et seq.

<sup>4</sup> LAMC §151.28.

California Air Resources Board (CARB). The Project would qualify for LEED Silver 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 as a result of the purchase of emission offset credits (refer to analysis in Section IV.F, *Greenhouse Gas Emissions*, in this Draft EIR). The Environmental Leadership Development Project certification and other related documentation are provided in Appendix G of this Draft EIR.

Pursuant to Public Resources Code Section 21187, within 10 days of the Governor certifying the Project as a leadership project, the City of Los Angeles issued a public notice stating that the Project 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 jurisdictional 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 PRC. A copy of Chapter 6.5 of the Public Resources Code is included in Appendix O of this EIR.

### **3. EIR Scoping Process**

In compliance CEQA and with the State *CEQA Guidelines*, the City has taken steps to provide the public, government agencies and other interested parties with opportunities to participate in the environmental process. During the preparation of the Draft EIR, the City contacted various federal, State, regional, and local government agencies and other interested parties to inform those agencies and the public of the Project and to solicit comments on the scope of its environmental review. As further described below, this process included distributing an Initial Study and NOP, and noticing and conducting a Public Scoping Meeting.

As discussed above, because the current Project is smaller in size and scale than Original Project, and because no new approvals are being sought that would create new significant environmental impacts, the current Project's environmental impacts would generally be similar to or less than the Original Project's estimated impacts at the time of NOP preparation. As such, the NOP provided sufficient information describing the current Project and the current Project's potential effects to enable the public and governmental agencies to prepare meaningful comments on the scope of the analyses to be included in this Draft EIR. The NOP and Scoping Meeting comments received by the City were reviewed and utilized in preparation of this Draft EIR.

#### **a) Initial Study**

In accordance with Section 15063(a) of the State *CEQA Guidelines*, the City undertook the preparation of an Initial Study. By the Initial Study, the City determined that the Original Project had the potential to result in significant impacts associated with a number of environmental issues. As a result of the Initial Study, the City determined that an EIR was required and that the Draft EIR should address those issues identified in the Initial



Study where the Project could potentially result in significant environmental impacts, and consider mitigation measures. As discussed above, since the current Project's environmental impacts would generally be similar to or less than the Original Project's impacts were estimated to be in the Initial Study, the conclusions of the Initial Study apply equally to the current Project as to the Original Project.

The Draft EIR focuses primarily on changes in the environment that could result from the Project, both individually and cumulatively with the related projects. The Draft EIR identifies potentially significant direct and indirect impacts that could result from construction and operation of the Project, identifies mitigation measures to reduce or avoid such effects, and assesses alternatives to the Project. Based on the Initial Study, this Draft EIR assesses the Project's environmental effects in the following areas:

- Aesthetics<sup>5</sup>
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
  - Fire Protection and Emergency Medical Services
  - Police Services
  - Schools
  - Library Services
  - Parks and Recreation Services
- Transportation
- Tribal Cultural Resources
- Utilities

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<sup>5</sup> The evaluation of the Project's environmental impacts associated with aesthetics pursuant to CEQA shall not be considered significant impacts on the environment pursuant to Senate Bill B 743 and ZI No. 2452 and is not required in this EIR (with the exception of impacts on historic resources). Historic resources are evaluated in full in Section IV.C, Cultural Resources, of this EIR. Nonetheless, an evaluation of the Project's physical impacts associated with aesthetics is provided for informational purposes only.

- Water Supply
- Wastewater
- Solid Waste
- Energy Infrastructure

Based on the Initial Study, as discussed above, issues as to which the Project would not create significant impacts, which include Agriculture and Forestry Resources, Biological Resources, Hazards and Hazardous Materials, and Mineral Resources, are addressed in Chapter VI, *Other CEQA Considerations*, of this Draft EIR. See also the Initial Study, which is included in Appendix A-1 of this Draft EIR.

### **b) Notice of Preparation**

Pursuant to Section 15082 of the State CEQA Guidelines, the City circulated an NOP to State, regional, and local agencies, and members of the public for a 30-day period commencing on November 25, 2015 and ending on December 28, 2015. The purpose of the NOP was to formally convey and give notice of the fact that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A-1, *NOP/Initial Study*, of this Draft EIR.

### **c) Public Scoping Meeting**

The NOP included notification that a public scoping meeting would be held in an open house format to further inform public agencies and other interested parties of the Project and to solicit input regarding the content of the Draft EIR. The meeting was held on December 9, 2015 between 6:30 P.M. and 8:30 P.M. at the Fire Station 82 Annex Conference Room, 1800 N. Bronson Avenue, Los Angeles, CA 90028. The meeting provided interested individuals, groups, and public agencies with the opportunity to view materials, ask questions, and provide comments to the City regarding the scope and focus of the Draft EIR. See Appendix A-2 of this Draft EIR for the Scoping Meeting Materials.

### **d) Comments Received**

Twenty-nine (29) written comment letters responding to the NOP were submitted to the City by public agencies, interested parties, and individuals. Of the 29 comment letters, 22 were provided by individuals, with the remaining comment letters received from the following agencies and/or organizations: California State Clearinghouse; Soboba Band of Luiseno Indians; State of California, Department of Transportation (Caltrans); Metropolitan Transportation Authority (Metro); South Coast Air Quality Management District (SCAQMD); Los Angeles Unified School District (LAUSD); and Hollywood Heritage, Inc. Copies of the public comments received during the NOP circulation period are provided in Appendix A-3 of this Draft EIR and are summarized in the Executive

Summary, Subsection D, *Areas of Controversy/Issues to be Resolved*, in this Draft EIR. These comments are also addressed in general throughout this Draft EIR where applicable.

## 4. Format of the Draft EIR

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

- Executive Summary.** This section 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 any 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 Design Features, Project impacts, and mitigation measures, and the level of impact significance following implementation of mitigation measures.
- I Introduction.** This chapter provides a summary of the Project as originally and currently designed, describes the purpose of the EIR, including CEQA compliance requirements, the steps undertaken to date regarding implementation of the CEQA process, and explains the Draft EIR's organization.
- II Project Description.** This chapter describes the location, objectives, and physical and operational characteristics, components and features of the Project.
- III General Description of Environmental Setting.** This chapter presents a general overview of the Project's existing environmental setting, including on-site and surrounding land uses. This chapter also provides a list and the mapped locations of past, present, and probable future projects that the City has identified as the related projects to be considered in the analysis of the Project's potential Project contributions to cumulative impacts, where appropriate.
- IV Environmental Impact Analysis.** This chapter contains sections addressing the each of the following environmental issues: (1) Aesthetics; (2) Air Quality; (3) Cultural Resources; (4) Energy; (5) Geology and Soils; (6) Greenhouse Gas Emissions; (7) Hydrology and Water Quality; (8) Land Use and Planning; (9) Noise; (10) Population and Housing; (11) Public Services; (12) Transportation; (13) Tribal Cultural Resources; (14) Utilities. Each section contains the environmental setting, regulatory framework, analytical methodology, thresholds of significance, Project characteristics, Project Design Features, project-level and cumulative impact analyses and significance determinations prior to mitigation, any required mitigation measures, and conclusions regarding the level of significance after any required mitigation relating to the particular environmental issues addressed in the section.
- V Alternatives.** This chapter describes a reasonable range of alternatives to the Project, including the No Project/No Build Alternative, the Primarily Residential

Mixed-Use Alternative, Code Compliant Reduced Density Alternative, and the Primarily Office Mixed-Use Alternative. This section also evaluates and analyzes the environmental effects of each of the alternatives for each issue area analyzed in the Draft EIR and compares them to the Project.

- **No Project/No Build Alternative**
- **Primarily Residential Mixed-Use Alternative**
- **No Zone Change/ No High Density Change/ No Density Bonus Alternative**
- **Primarily Office Mixed-Use Alternative**

**VI Other CEQA Considerations.** This chapter includes a discussion of issues required by CEQA that are not covered in the other chapters. These include any significant unavoidable impacts, the reasons why the Project is being proposed notwithstanding significant unavoidable impacts, any 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.

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

**VIII List of EIR Preparers.** This section lists the persons who contributed to the preparation of this 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 Public Comments on the NOP

A-1. Notice of Preparation

A-2. Initial Study

A-2. Scoping Meeting Materials

A-3. Public Comments on the NOP

**Appendix B.** CRA/LA Memorandum on Discretionary Land Use Actions: June 21, 2012

**Appendix C.** Air Quality Technical Appendix

C-1. Air Quality Technical Appendix

C-2. Freeway Health Risk Assessment

**Appendix D.** Cultural Resources Documentation

D-1. Historical Resources Assessment

D-2. Historical Resources Assessment Peer Review Memorandum

D-3. Archaeological and Paleontological Resources Assessment

**Appendix E. Energy Worksheets**

**Appendix F. Geotechnical Reports**

F-1. Geotechnical Feasibility Report

F-2. Supplemental Geologic Lot Evaluation

F-3. Fault Activity Investigation for NE Corner of Yucca and 1800 Argyle Avenue

F-4. Fault Activity Investigation for Yucca-Argyle Apartments

**Appendix G. Greenhouse Gas Emissions and ELDP Documentation**

G-1. Greenhouse Gas Technical Appendix

G-2. Environmental Leadership Development Project Application and Certification

**Appendix H. Drainage Study**

**Appendix I. Noise and Vibration Technical Appendix**

**Appendix J: Population, Housing, and Employment Data**

**Appendix K. Public Services Correspondence**

K-1. Los Angeles Fire Department Correspondence

K-2. Los Angeles Police Department Correspondence

K-3. Los Angeles Unified School District Correspondence

K-4. Los Angeles Department of Recreation and Parks Correspondence

K-5. Los Angeles Public Library Correspondence

**Appendix L. Transportation**

L-1. CEQA Thresholds Transportation Memorandum

L-2. Traffic Study

L-3 CEQA Thresholds Alternatives Transportation Memorandum

**Appendix M. Tribal Cultural Resources Report**

**Appendix N. Utility Correspondence and Technical Data**

N-1. Water System and Supply Report

N-2. Wastewater Technical Memorandum & WWSI Letter

## 5. Public Review of the Draft EIR

The Draft EIR is subject to a 45-day review period during which the document is made available to responsible and trustee agencies and interested parties, including members of the public. In compliance with the provisions of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the City, serving as the Lead Agency: (1) published a Notice of Completion and Availability (NOCA) of a Draft EIR which stated that the Draft EIR would be available for review at the City's Planning Department, 221 N. Figueroa Street, Room 1350, Los Angeles, CA 90012; (2) provided paper copies of the NOCA and of the Draft EIR and its appendices to the Los Angeles Central Library, Frances Howard Goldwyn – Hollywood Regional Library, and Will and Ariel Durant Branch Library; (3) posted the NOCA and the entire Draft EIR on the City's website (<https://planning.lacity.org/development-services/eir>); (4) prepared and transmitted a NOCA to the State Clearinghouse; (5) sent a NOCA to all property owners within 500 feet of the Project Site; and (6) sent a NOCA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about either the Original Project or the current Project. Proof of publication is available at the Department of City Planning (see address below). The Draft EIR public review period commenced on April 23, 2020, and will end on June 8, 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, via U.S. Mail or e-mail, to the following addresses prior to the end of the public review period:

**Mail:** Alan Como, AICP  
Los Angeles City Planning  
221 N. Figueroa Street, Room 1350  
Los Angeles, California 90012

**Email:** [alan.como@lacity.org](mailto:alan.como@lacity.org)

**Reference Case No.:** ENV-2014-4706-EIR

Upon the close of the public review period, the City will consider and prepare responses to all relevant written comments received from public agencies and members of the public during the public review period, and a Final EIR will then be prepared. The Final EIR will consist of the Draft EIR, possible revisions to the Draft EIR, comments submitted by public agencies and members of the public during the public circulation period for the Draft EIR, and the City's responses to those comments. After the Final EIR has been completed and at least 10 days prior to its certification, the City's responses to the comments made by public agencies on the Draft EIR will be provided to the commenting agencies.

# Chapter II

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## Project Description

### 1. Introduction

The Project proposes to redevelop an approximately 1.16-acre (net area) property on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue, generally referenced as 6220 West Yucca Street (Project Site), with a mixed-use residential, hotel, and commercial/restaurant project (the Project). The Project Site is located within the Hollywood community of the City of Los Angeles (City), and is currently improved with one single-family residence, one duplex with a detached garage and a studio apartment over the garage, and three, two-story apartment buildings with associated carports and paved surface parking areas, all of which would be demolished and removed to allow development of the Project. Overall, the Project Site currently contains a total of 43 multi-family units (duplex = 2 units; 1 studio apartment over the duplex garage, apartment buildings = 40 units) and one single-family residence. Thus, there are a total of 44 residential units currently on the Project Site.

The Project would consist of two buildings, Building 1 and Building 2. Building 1 of the Project, located at the southeast corner of Yucca/Argyle, would occupy the majority of the Project Site. It would include a six-level podium parking structure with: two fully subterranean levels (P3 and P2 Levels); two semi-subterranean levels (P1 and L1 Levels – due to site's sloping topography); and two entirely above-ground levels (L2 and L3). Atop Level 3 (the highest podium level), Building 1 would include Levels 4 through 20. Thus, Building 1 would be 255 feet tall as viewed from Argyle Avenue (at the lowest adjacent surface point along Argyle Avenue). From Yucca Street, Building 1 would be 20 stories tall (ranging from approximately 40 feet to 250 feet). Level L1 primarily fronts Yucca Street. Building 1 would include a mix of commercial, hotel and residential uses (210 residential units). Building 2, located at the southwest corner of Yucca Street and Vista Del Mar Avenue, would include three residential levels (with 13 residential units total) over a 2-story podium parking structure, which would include one subterranean parking level (P2 Level) and one semi-subterranean parking level (P1 Level). Building 2 would have a maximum elevation of approximately 34 feet as viewed from Yucca Street. Due to the sloping topography along Vista Del Mar Avenue, the maximum elevation of Building 2 at the southern Project Site boundary would be approximately 47 feet, as a portion of the semi-subterranean P1 parking level would be visible from Vista Del Mar Avenue at this location. Building 2 would contain only residential uses.

Overall, the Project (including both buildings) would include 210 multi-family residential units, 136 hotel rooms and approximately 12,570 square feet of commercial/restaurant

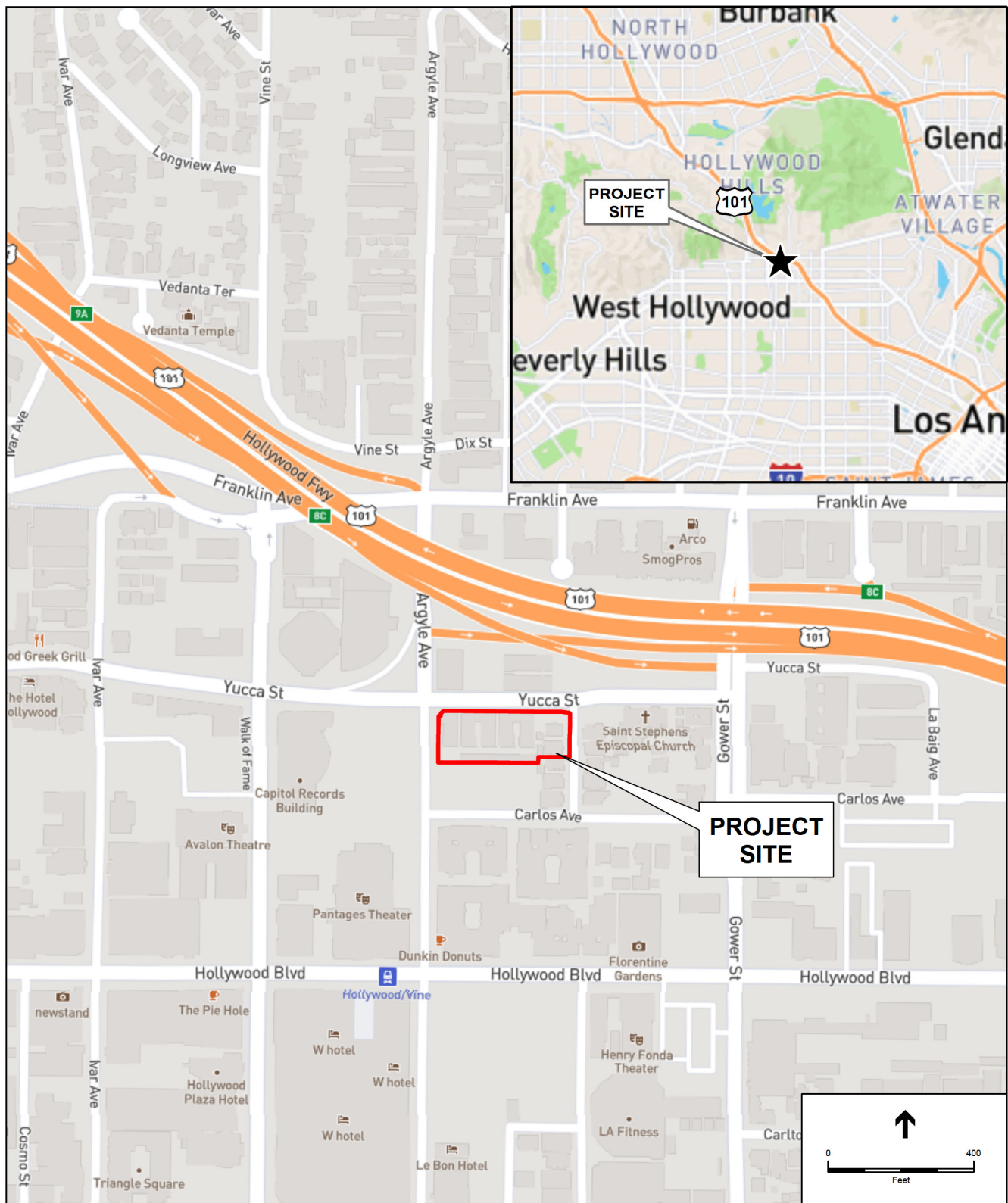
uses. Parking would be provided on-site within the six-level parking structure housed within the podium structure of Building 1 and the two-level parking structure housed within Building 2. A detailed discussion of the Project is provided below.

## 2. Project Location and Surrounding Uses

The Project Site is located on the south side of West Yucca Street between Argyle Avenue and North Vista Del Mar Avenue (addresses: 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue) in the Hollywood community of the City, approximately five miles northwest of Downtown Los Angeles as shown on **Figure II-1, Regional and Local Project Vicinity Location Map**. The Project Site is bounded by Yucca Street, the 16-story Kimpton Everly Hotel and 3-story residential lofts to the north; North Vista Del Mar Avenue and 1- and 2-story single-family residences and duplexes to the east; vacant land (former Little Country Church of Hollywood) and 1- and 2-story single-family residences and duplexes followed by a 5-story mixed-use residential and commercial development to the south; and Argyle Avenue and commercial and residential uses to the west, including the 18-story Argyle House Project (multi-family residential and commercial uses) at the southwest corner of Yucca Street and Argyle Avenue. **Figure II-2, Aerial Photograph with Surrounding Land Uses**, illustrates the surrounding uses.

The Project Site vicinity is highly urbanized and generally built-out. It is located within a part of the active regional center of Hollywood, which has a mix of commercial, studio/production, office, entertainment, and residential uses. The Project Site is served by a network of regional transportation facilities. Various public transit stops operated by the Los Angeles County Metropolitan Transportation Authority (Metro) are located in close proximity to the Project Site. The nearest Metro Red Line station, at Hollywood Blvd./Vine Street, is located one block, or approximately 0.13 miles, southwest of the Project Site. The Project Site area is also served by bus lines operated by the Los Angeles Department of Transportation's (LADOT's) Downtown Area Shuttle (DASH). For existing transit service and a summary of bus lines providing service in the Project Site vicinity, refer to Section IV.K, Transportation and Traffic, of this Draft EIR. The Hollywood Freeway (US Route 101) is located approximately 200 feet north of the Project Site; Interstate 10 is located approximately five miles to the south; Interstate 110 is located approximately five miles to the southeast; Interstate 5 is located approximately five miles to the east; State Route 134 is located approximately five miles to the north; and Interstate 405 is located approximately eight miles to the southwest. There are a number of historical resources located in the Project Site vicinity, including the Capitol Records building to the west of the Project Site along Yucca Street, the vacant site of the former Little Country Church of Hollywood immediately south of the Project Site, and other resources located within the Vista Del Mar Avenue/Carlos Historic District to the east of the Project Site, which includes two parcels or lots within the Project Site along Vista Del Mar Avenue (1765 and 1771 Vista Del Mar Avenue).

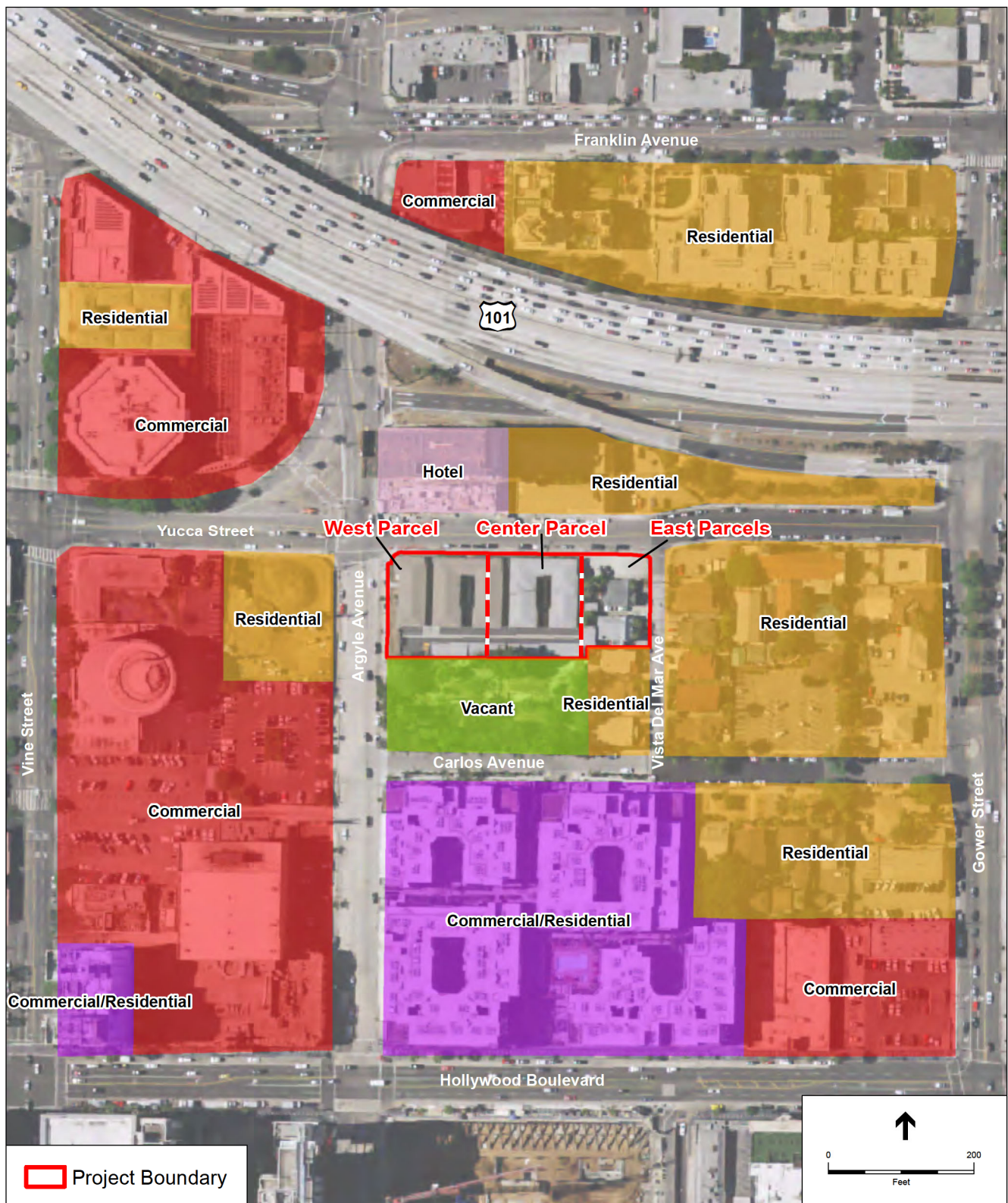




SOURCE: Open Street Map, 2017

6220 West Yucca Project

**Figure II-1**  
Regional and Local Project Vicinity Location Map



SOURCE: NAIP, 2016 (Aerial).

6220 West Yucca Project

**Figure II-2**  
Aerial Photograph with Surrounding Land Uses



### 3. Site Background and Existing Conditions

As stated above, the approximate 1.16-acre Project Site is currently improved with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings (43 existing multi-family/apartment units total) within associated carports and paved surface parking areas, as shown in Figure II-2. The three two-story apartment buildings located along Yucca Street have carport parking at the rear with driveway access from Yucca Street, as well as access to a separate fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue. The 3,118 square-foot apartment building on the corner of Yucca Street and Argyle Avenue includes eight (8) residential units. The two, 6,236 square-foot apartment buildings farther to the east along Yucca Street include 16 residential units each.

The single-family residence and the duplex with a detached garage and a studio apartment over the garage located on the Project Site front on Vista Del Mar Avenue. The 1,367 square-foot single-family residence, built in 1920, at 1771 Vista Del Mar Avenue is located just south of the fenced surface parking lot at the southwest corner of Vista Del Mar and Yucca Street. Immediately adjacent to and to the south of that residence is a 2,942 square-foot duplex built in 1918 (1765 Vista Del Mar Avenue) (a former single-family residence). Above the duplex's detached garage is an approximately 500 square-foot studio apartment. The Project Site was previously graded for the existing development and is generally flat, but the topography of the bordering Vista Del Mar Avenue and Argyle Avenue streets gently slopes downward from the north at Yucca Street to the south toward Carlos Avenue.

### 4. Planning and Zoning

The Project Site is located within the Hollywood Community Plan Area in the City. The Project Site has General Plan land use designations of Regional Center Commercial and Medium Residential, and is currently zoned Commercial-Height District 2 with Development Limitation-Sign Supplemental Use District (C4-2D-SN), Multiple Dwelling-Height District 2 with Development Limitation (R4-2D), and Multiple Dwelling-Height District 1XL ([Q]R3-1XL). Illustrations of the Project Site's and surrounding uses land use and zoning designations are shown in Figures IV.H-1, *Land Use Designations*, and Figure IV.H-2, *Zoning*, respectively, in Section IV.H, *Land Use and Planning*, of this Draft EIR.

The 'Q' Condition limits the residential density to one dwelling unit per 1,200 square feet of lot area. The 'D' limitation restricts the Floor Area Ratio (FAR) to 2:1, unless certain approvals are received.<sup>1</sup> The Project Site is located in the Hollywood Redevelopment Plan area, which limits Regional Center Commercial designations to a 4.5:1 FAR, or to a maximum 6:1 FAR with City Planning Commission approval. The Hollywood

<sup>1</sup> "D Limitation per Ordinance No. 165662, The 'D' Limitation restricts the Floor Area Ratio to 2:1, with a provision that a project can exceed the FAR as long as the 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.

Redevelopment Plan also requires an Owner Participation Agreement for projects exceeding a 4.5:1 FAR. The Project Site is also located in a Los Angeles State Enterprise Zone; an Adaptive Reuse Incentive Area; and a portion of the Project Site (properties along Vista Del Mar Avenue only) is located within the Vista Del Mar Avenue/Carlos Historic District. According to the CRA/LA Memorandum on Discretionary Land Use Actions dated June 21, 2012, land use designations on the Redevelopment Plan Map defer to and are superseded by the underlying City of Los Angeles Community Plan and Zoning Ordinance designations within the Hollywood Redevelopment Plan area (a copy of this memorandum is included in Appendix B to this Draft EIR). Future permit applications therefore will not require CRA/LA discretionary land use approvals in this redevelopment area.

## 5. Project Objectives

Section 15124(b) of the State CEQA Guidelines provides that the project description shall include, “A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings of a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.”

The underlying purpose of the Project is to redevelop the underutilized Project Site, which is located in a Transit Priority Area, and which currently contains aging, low-density, rent stabilized residential multi-family units and one single-family home with a high-density development providing a mix of residential units and hotel and commercial/restaurant uses to meet the community’s need for a range of housing options and new jobs, and to attract visitors to the area’s businesses, restaurants and attractions.

The objectives for the Project are as follows:

1. To construct an infill development that balances commercial and residential uses by providing a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the Project Site area.
2. To redevelop the underutilized Project Site with an economically viable and attractive transit-oriented high-density mixed-use development that is appropriate for the Project Site’s location in a Transit Priority Area and is consistent with its designation as Regional Center and Hollywood Center.
3. To promote and support local and regional mobility, greenhouse gas and air quality objectives to reduce vehicle miles traveled, reduce reliance on single-passenger vehicles and increase the use of public transit, and maximize infill development by constructing a high-density residential, hotel and commercial/restaurant mixed-use development on a site within a designated Transit Priority Area that is located within one-quarter mile of key public transit facilities, including the Hollywood and Vine Red Line Station.

4. To provide a diverse mix of dwelling units that appeal to a range of household sizes to help meet the critical demand for new housing in the Hollywood Community Plan area.
5. To increase the City's stock of rent controlled units under the City's RSO through a project that provides 100 percent of its residential apartment units as RSO units.
6. To provide a right of return for residents of existing onsite residential apartment units subject to the RSO.
7. To support job creation and to increase business opportunities within Los Angeles by developing the Project's hotel and commercial/restaurant uses on a site well-served by transit.
8. To revitalize the streetscape surrounding the Project Site and encourage pedestrian activity and bicycle use by creating a streetscape design that allows for outdoor café tables, parkway planters and bicycle parking within an overall landscape design that integrates the Project development into the surrounding urban neighborhood.

## 6. Description of the Proposed Project

### a) Project Uses

The proposed mix of uses would be developed within two buildings: Building 1 would include a mix of residential, hotel and commercial/restaurant uses; and Building 2 would include only residential uses. Overall, the Project would include approximately 227,413 gross square feet of residential floor area within its 210 multi-family units, common areas and corridors; approximately 76,965 gross square-feet of hotel floor area with approximately 136 hotel rooms; and approximately 12,570 square feet of commercial/restaurant floor area. Therefore, the total development would include approximately 316,948 gross square feet of residential, hotel and commercial/restaurant uses for the purposes of floor area calculations, resulting in a floor area ratio (FAR) of 6.6:1.<sup>2</sup>

The Project Site currently contains a total of 44 existing residential units that would be demolished as part of the Project. Forty-three (43) of these existing units are subject to the City's Rent Stabilization Ordinance (RSO).<sup>3</sup> The RSO includes local regulations that implement the Ellis Act, a State law that regulates the transition of certain rental units to other uses.<sup>4</sup> Under the RSO, project applicants are required to provide relocation assistance to any existing tenants of RSO units that are replaced. For such tenants, applicants are required to provide relocation assistance in the form of a specified monetary payment set by the RSO that is meant to cover relocation expenses. In compliance with these requirements, existing tenants on the Project Site would be provided relocation assistance as required by the RSO. The RSO also imposes

<sup>2</sup> Project is seeking a Conditional Use Permit (CUP) for relief from the maximum 6:1 FAR.

<sup>3</sup> The RSO is contained in Los Angeles Municipal Code (LAMC) Chapter XV.

<sup>4</sup> Cal. Gov't Code §§ 7060 et seq.

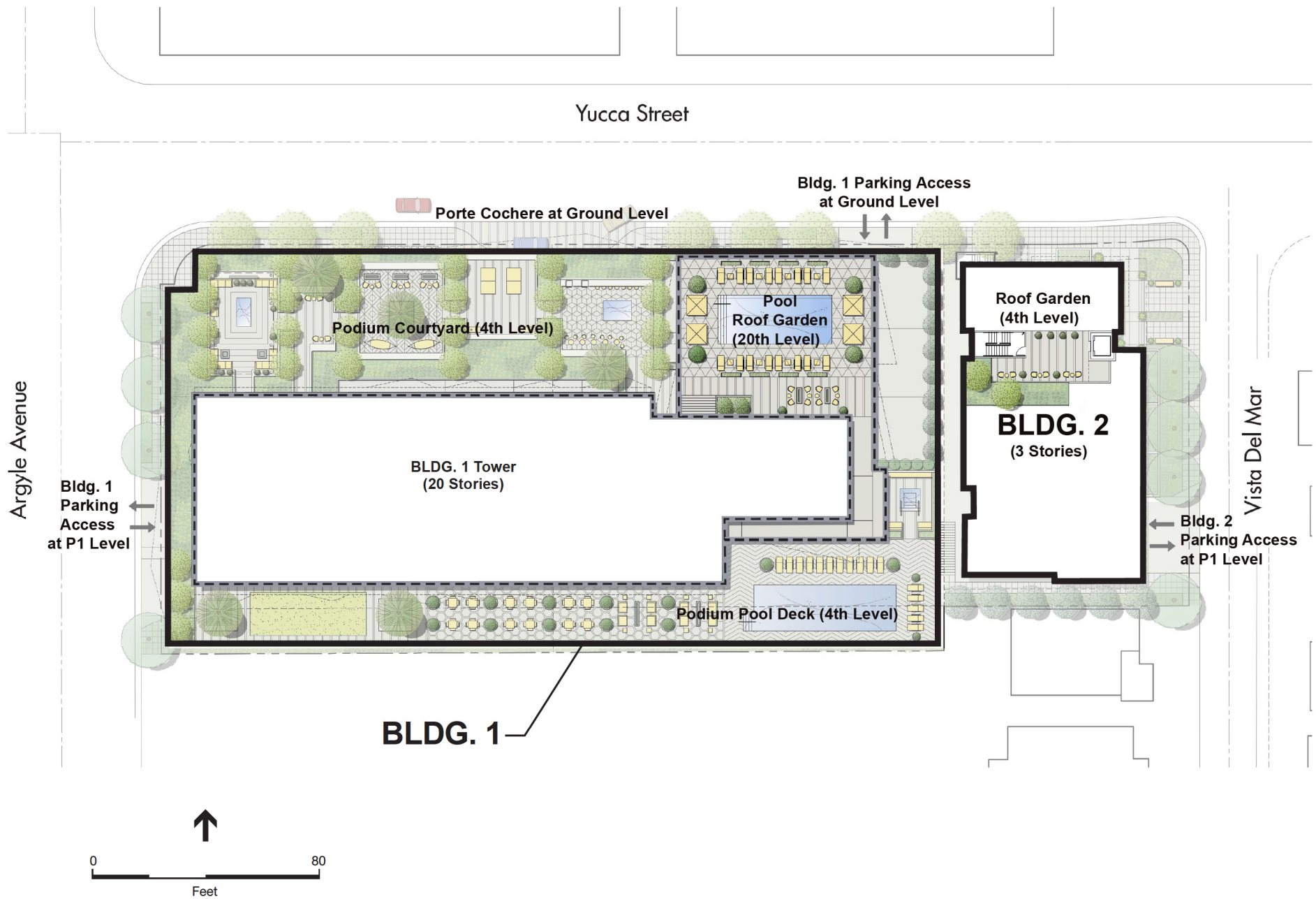
replacement unit requirements where RSO units are replaced.<sup>5</sup> To comply with these requirements, the Project would provide 100 percent of its 210 residential dwelling units as RSO units. In addition, though not required by law, the Project would provide all onsite tenants a right of return to comparable units within the Project at their last year's rent once the Project is occupied plus applicable annual increases under the RSO. In addition, during construction, the Project would fund the difference in rent between the tenants' current rent and new rent until the right of return is exercised.

The proposed development is summarized below in **Table II-1, Proposed Project Summary**. The site plan is illustrated in **Figure II-3, Site Plan**. The Project buildings and proposed uses are described further below.

**TABLE II-1  
PROPOSED PROJECT SUMMARY**

<b>Residential Units (Buildings 1 and 2)</b>	
One Bedroom	104 units
Two Bedroom	96 units
Suite <sup>a</sup>	10 units
<b>Total</b>	<b>210 units</b>
Residential Gross Floor Area (Building 1)	211,068 s.f.
Residential Gross Floor Area (Building 2)	16,345 s.f.
<b>Residential Unit Floor Area (Net)</b>	<b>227,413 s.f.</b>
<b>Hotel Units (Building 1)</b>	
Rooms (365 - 495 s.f. each)	116 units
Suites (550 - 760 s.f. each)	20 units
<b>Total</b>	<b>136 rooms</b>
<b>Hotel Gross Floor Area</b>	<b>76,965 s.f.</b>
<b>Commercial/Restaurant Uses (Building 1)</b>	<b>12,570 s.f.</b>
<b>Project Floor Area</b>	
Building 1 Floor Area	300,603 s.f.
Building 2 Floor Area	16,345 s.f.
<b>Total Project Floor Area</b>	<b>316,948 s.f.</b>
<b>Total Buildable Area</b>	<b>48,022 s.f.</b>
FAR	6.6:1
<sup>a</sup> The residential "suites" are larger floor area units located on the 19th and 20th floors, hotel "suites" are accommodations that generally have a separate living area. Notes: s.f. = square feet; avg. = average; FAR = floor area ratio Source: Togawa Smith Martin, 2019.	

<sup>5</sup> LAMC §151.28.



SOURCE: Togawa Smith Martin, Inc., 2015

6220 West Yucca Project

**Figure II-3**  
Site Plan

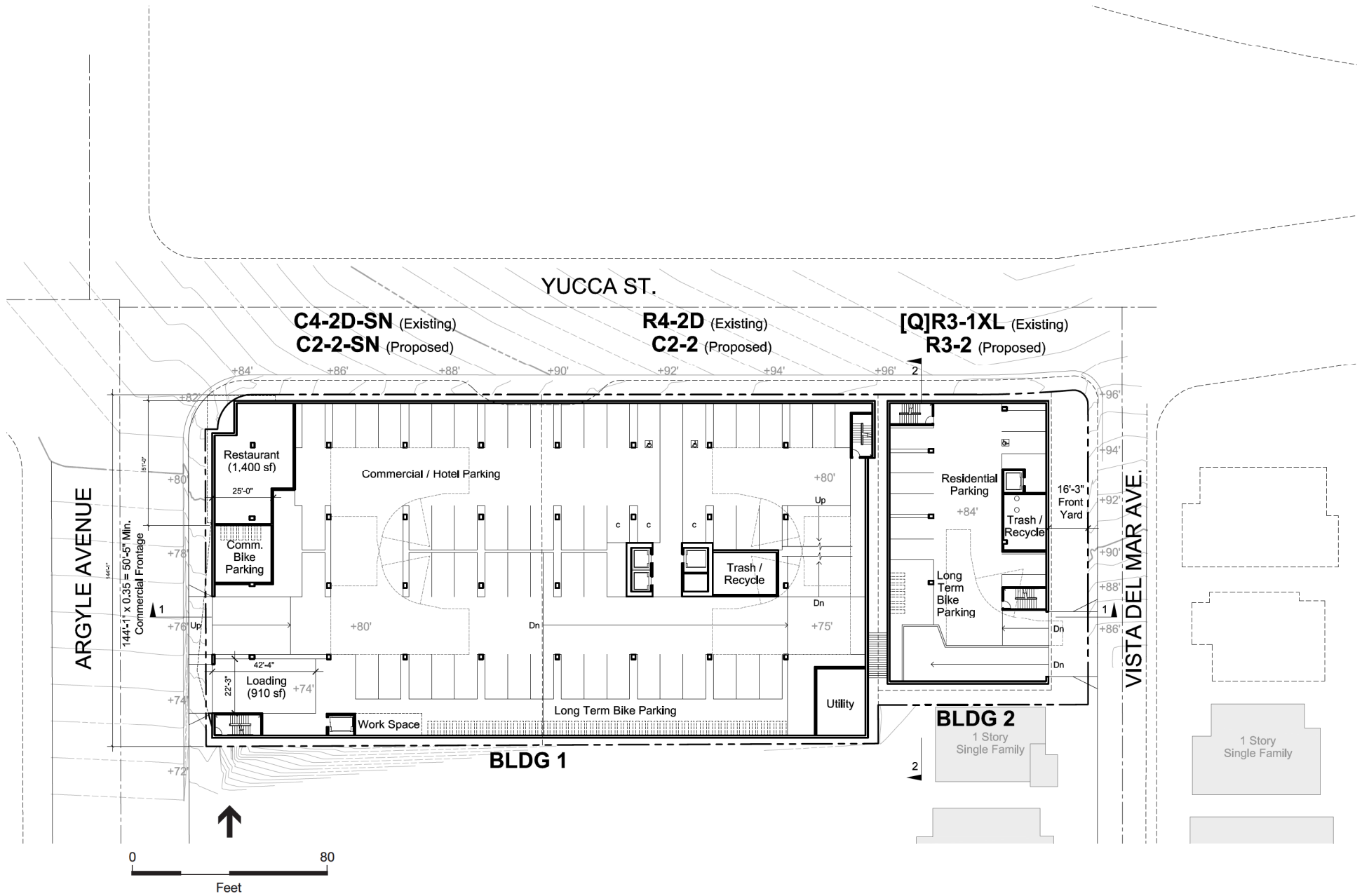
## (1) Building 1

As described above, Building 1, located at the southeast corner of Yucca Street and Argyle Avenue, would include a six-level podium parking structure with two fully subterranean levels (P3 and P2 Levels); two semi-subterranean levels (P1 and L1 Levels – due to Project Site’s sloping topography); and two entirely above-ground levels (L2 and L3). Atop Level 3 (the highest podium level), Building 1 would include Levels 4 through 20. Thus, Building 1 would stand up to approximately 255 feet tall as measured from the P1 level along Argyle Avenue, the lowest surface point. (Level L-1 is considered as the ground level as it primarily fronts Yucca Street.) Level P1 primarily fronts Argyle Avenue due to the Project Site’s downward sloping topography from north to south. Building 1 setbacks would be 0 feet along Yucca Street, Argyle Avenue, and the southern property line for the podium; and 16 feet from the southern property line for the residential/hotel tower to allow for the outdoor podium uses on Level 4 (see Figure II-6). Building 1 would also house an on-site emergency generator, which with other mechanical equipment would be located on the rooftop or building interior, and shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. The on-site emergency generator would be rated at an estimated 250 kilowatts (350 horsepower).

### (a) Hotel Component

Building 1 would include approximately 76,965 gross square feet of hotel use floor area, which includes 4,600 net square feet of meeting space and 4,000 net square feet back-of-house space on Level 1. The hotel’s 136 rooms, located on Levels 5 through Level 8 of Building 1, would include 116 rooms ranging from 365 to 495 square feet and 20 suites ranging from 550 to 760 square feet in size. Hotel and guest access would be provided via the porte-cochere and hotel lobby/leasing/lounge located at the Level 1 on Yucca Street. Commercial/Restaurant Component [Level P1, Ground Level (Level 1), and Level 4] Building 1 would include a total of approximately 12,570 square feet of commercial/restaurant uses. The P1 Level would contain approximately 1,400 square feet of restaurant space at the corner of Argyle Avenue and Yucca Street. The ground level (L1), accessible from Yucca Street, would contain an approximately 3,270-square foot restaurant space and an approximately 3,450-square foot commercial space. Level 4 would contain an approximate 4,450-square foot restaurant/bar with outdoor dining. **Figure II-4, P1 Level Plan**, and **Figure II-5, Ground Level Plan**, illustrate the internal circulation, as well as the proposed uses and parking in the P1 level and ground level, respectively. **Figure II-6, Level 4 Plan**, illustrates the 4<sup>th</sup> level plan, including the restaurant/bar space.



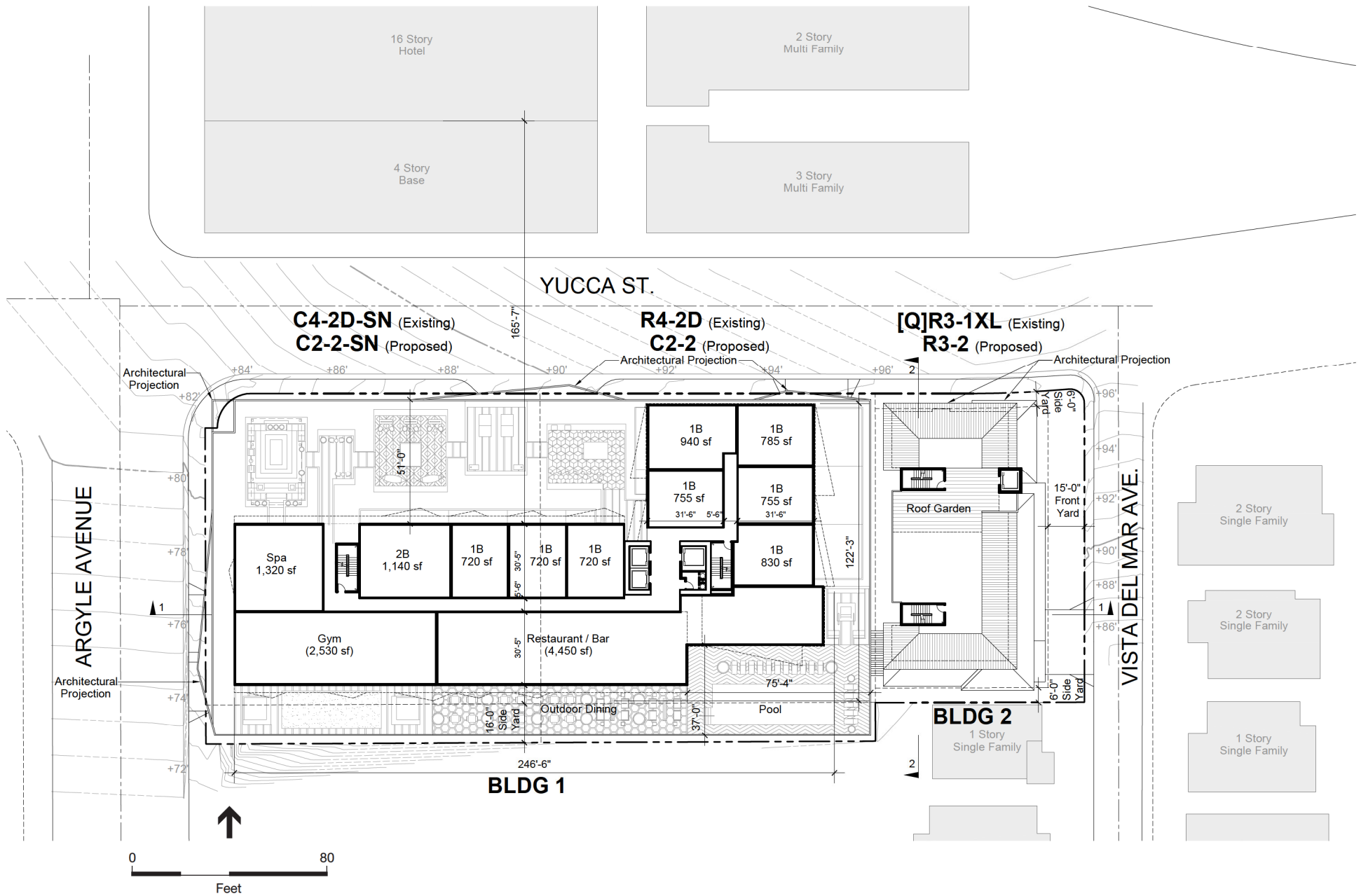


SOURCE: Togawa Smith Martin, Inc., 2017

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**Figure II-4**  
P1 Level Plan





SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure II-6**  
Level 4 Plan

### (b) Residential Component

Building 1 would include 210 residential units, representing approximately 211,068 gross square feet of residential floor area, located on Level 4 and Levels 9 through 20. Building 1 would include 99 one-bedroom units, 88 two-bedroom units, and 10 suites. The suites would contain larger living room and bedroom space, but would not exceed two bedrooms. Four (4) suites would be located on Level 19 and the remaining six (6) suites would be located on Level 20. The one-bedroom units would range between 695 and 940 square feet and the two-bedroom units would range between 920 and 1,440 square feet. The suites would range between 1,080 square feet and 1,925 square feet. The residential units would be serviced by on-site staff including valet, doorman and resident manager, as well as resident security and service staff.

### (2) Building 2 – All Residential

As described above, Building 2, located at the southwest corner of Yucca Street and Vista Del Mar Avenue, would include three residential levels over a 2-story podium parking structure, with one subterranean parking level (P2 Level) and one semi-subterranean parking level (P1). Due to the sloping topography, Building 2 would stand 34 to a maximum 47 feet high to the top of the roof moving north to south along Vista Del Mar Avenue, and a maximum 34 feet to the top of the roof along Yucca Street.

On the 1<sup>st</sup> level, Building 2 would include a lobby and four (4) residential units. There would be five (5) residential units on Level 2 and four (4) residential units on Level 3. Of Building 2's total of 13 units, five (5) would be one-bedroom units and eight (8) would be 2-bedroom units, for a total of approximately 16,345 gross square feet of residential floor area. The one-bedroom units would range between 650 and 660 square feet and the two-bedroom units would range between approximately 990 and 1,260 square feet. Building 2 would have a 6-foot side yard setback (along Yucca Street) and to the south adjacent property line and a 15-foot front setback from Vista Del Mar Avenue.

## b) Building Designs

The conceptual design of Building 1 is modern, featuring a mix of glass and solid panel clad exterior walls for the residential and hotel components and the parking podium. Building 1 would have two massing components above the podium parking structure. The lower section (north-south elevation on Level 4 through Level 19) on the east side of Building 1 would have natural grey tinted windows in addition to solid panels. (See Figure II-12, *East Elevation (Vista Del Mar Avenue)*, below.) This lower section would act as an anchor for the larger, all glass Building 1 tower component (east-west mass on Level 4 through Level 20) which occupies the central and western tower component of Building 1. (See Figures II-9, *North Elevation (Yucca Street)*, and II-10, *South Elevation*, below.) Blue tinted glass would be used for the tower component's exterior windows. A combination of balcony cutouts and overhangs on the all-glass tower component would create patterns that ripple across the building's facades.

Building 1 would be tiered, as it would step back from the parking podium on all four sides, and would step back again at the top level to create a pool deck and private patios for the penthouse suites. These setbacks would reduce the building's perceived mass as viewed from the street level.

The changes in color and reflectivity between Building's two massing components would create a contrasting design along the building's facades. However, the glass windows in the Level 1 restaurant and retail uses would have no tinting. In addition, the outside wall surfaces of the parking podium would include solid panels and would also be overlain in some areas with tinted metal rods placed at slight angles to create a vertical screen.

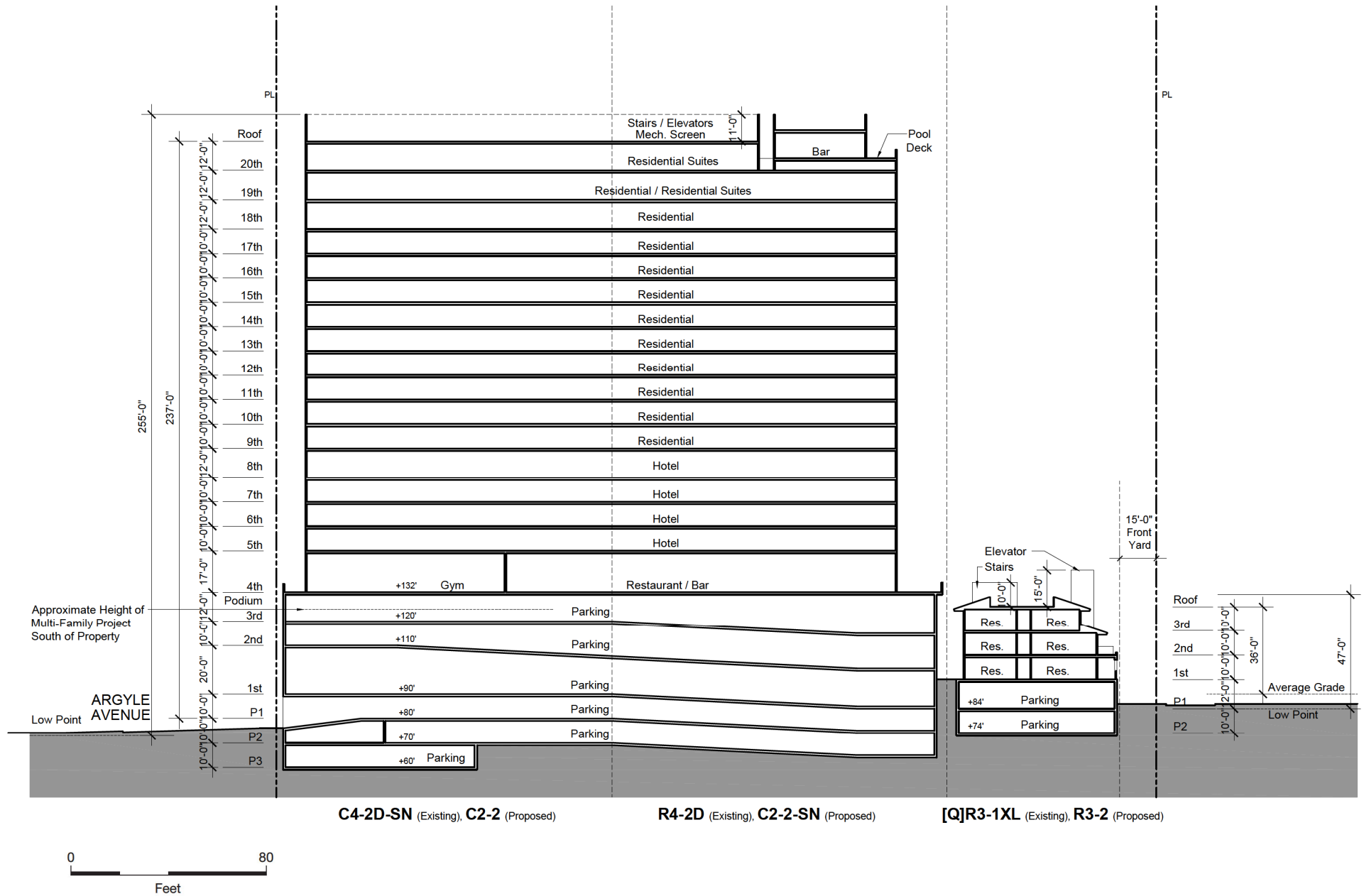
The conceptual design of Building 2 is a contemporary adaption of the Craftsman style. Its scale and 3-story height, stepped massing with sloped hip roofs, natural materials, muted color scheme and details are designed to create a transition to the single-family homes located in the Vista Del Mar Carlos Historic District. The Historic District includes properties flanking Vista Del Mar Avenue and Carlos Avenue between Yucca Street to the north and North Gower Street to the east.

Building 2's front setback of 15 feet along Vista Del Mar Avenue would be landscaped and would maintain the prevailing setback (12-15 feet) in the area. Building 2 would be setback 6 feet on Yucca Street and along the south property line. It would step back at Level 3 along Vista Del Mar Avenue at the south property line to reduce the sense of its mass.

### c) Building Elevations

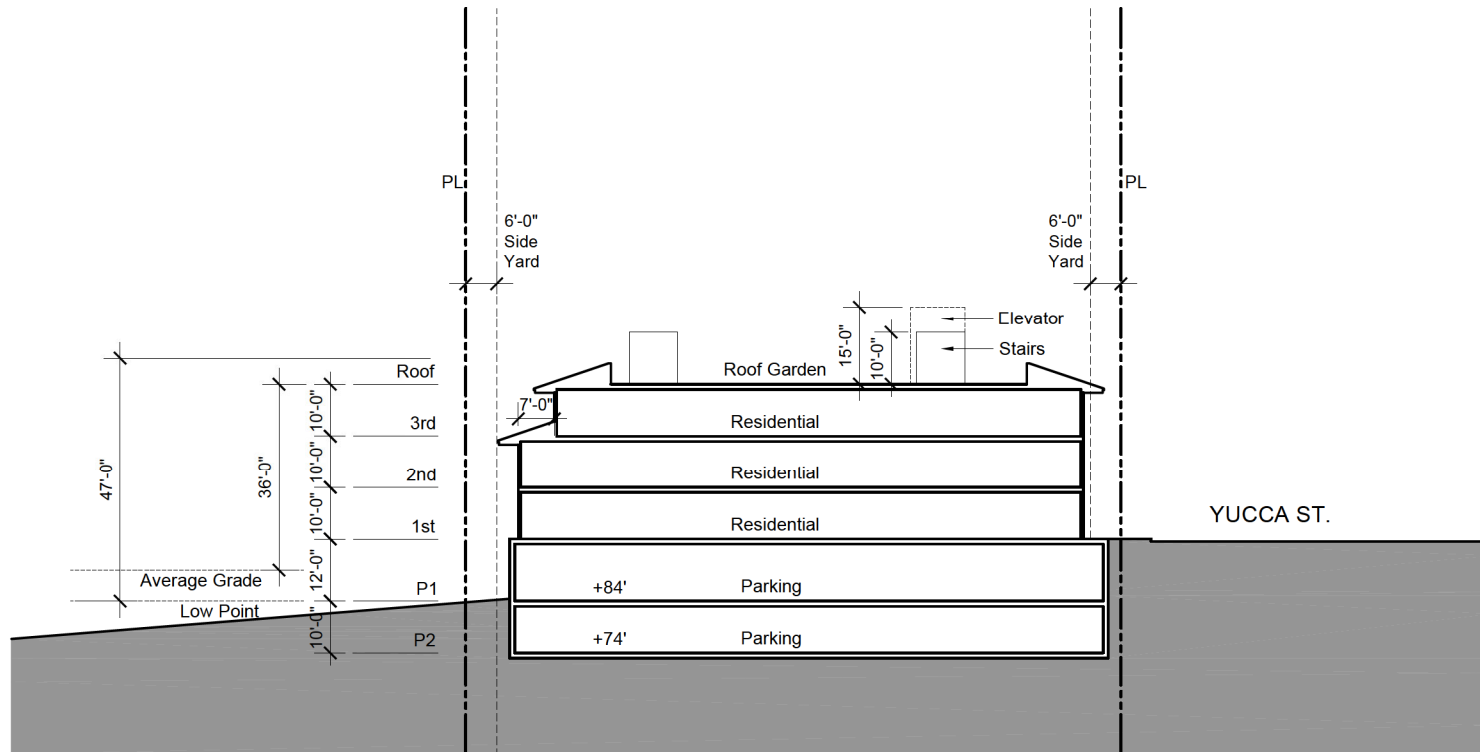
As described above, Building 1 would be 20 stories high, with a maximum elevation of 247 feet as viewed from Yucca Street (at the lowest adjacent surface point at Yucca's intersection with Argyle Avenue) or 255 feet as viewed from the lowest surface point along Argyle Avenue (at southern Project Site boundary). Building 2 would be 3 stories high, with a maximum elevation of 34 feet as viewed from Yucca Street. Due to the sloping topography along Vista Del Mar Avenue, the maximum elevation of Building 2 at the southern Project Site boundary would be 47 feet to the top of the roof, as a portion of the P1 parking level would be visible from Vista Del Mar Avenue at this location. An east-west building section illustrating the proposed mix of uses in Buildings 1 and 2 is shown in **Figure II-7, Building Sections: East-West**. **Figure II-8, Building Section: North-South**, illustrates a north-south building section for Building 2.

Building elevations from the north (Yucca Street), south, west (Argyle Avenue), and east (Vista Del Mar Avenue) are illustrated in **Figure II-9, North Elevation (Yucca Street)**, **Figure II-10, South Elevation**, **Figure II-11, West Elevation**, and **Figure II-12, East Elevation (Vista Del Mar Avenue)**, respectively.

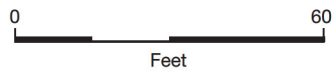


SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project  
**Figure II-7**  
 Building Sections: East-West



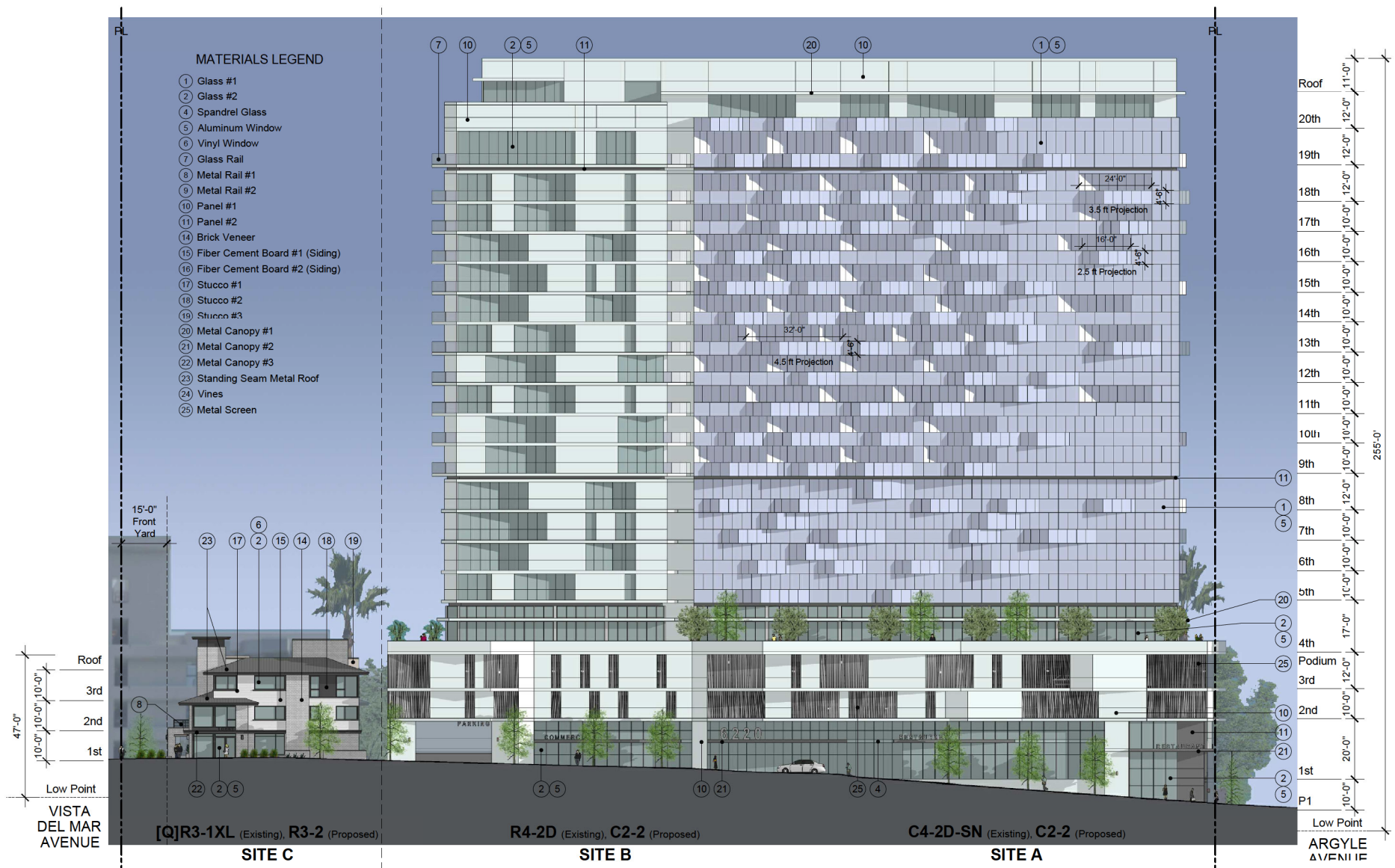
[Q]R3-1XL (Existing), R3-2 (Proposed)



SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure II-8**  
Building Sections: North-South

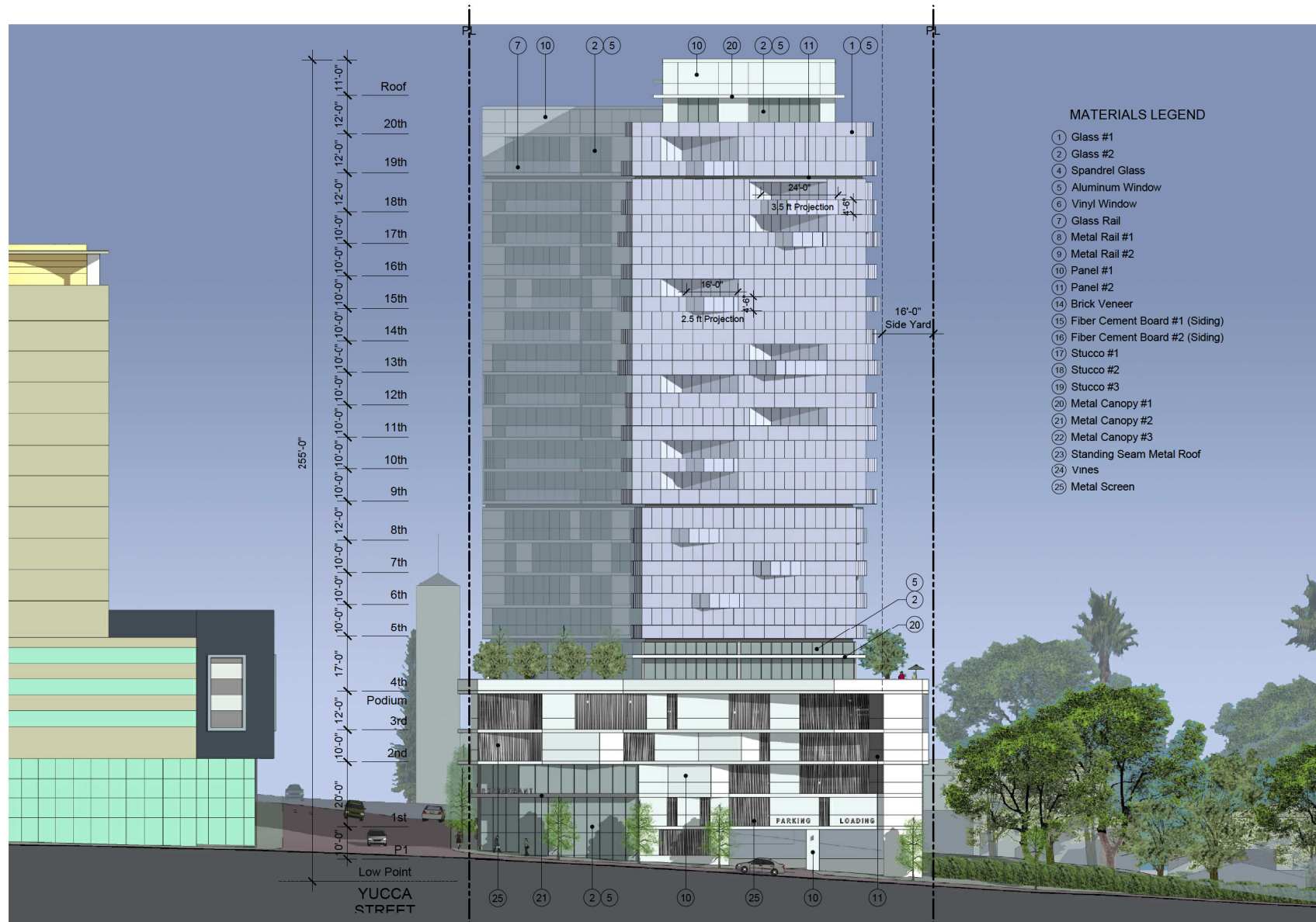


SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project  
**Figure II-9**  
 North Elevation (Yucca Street)



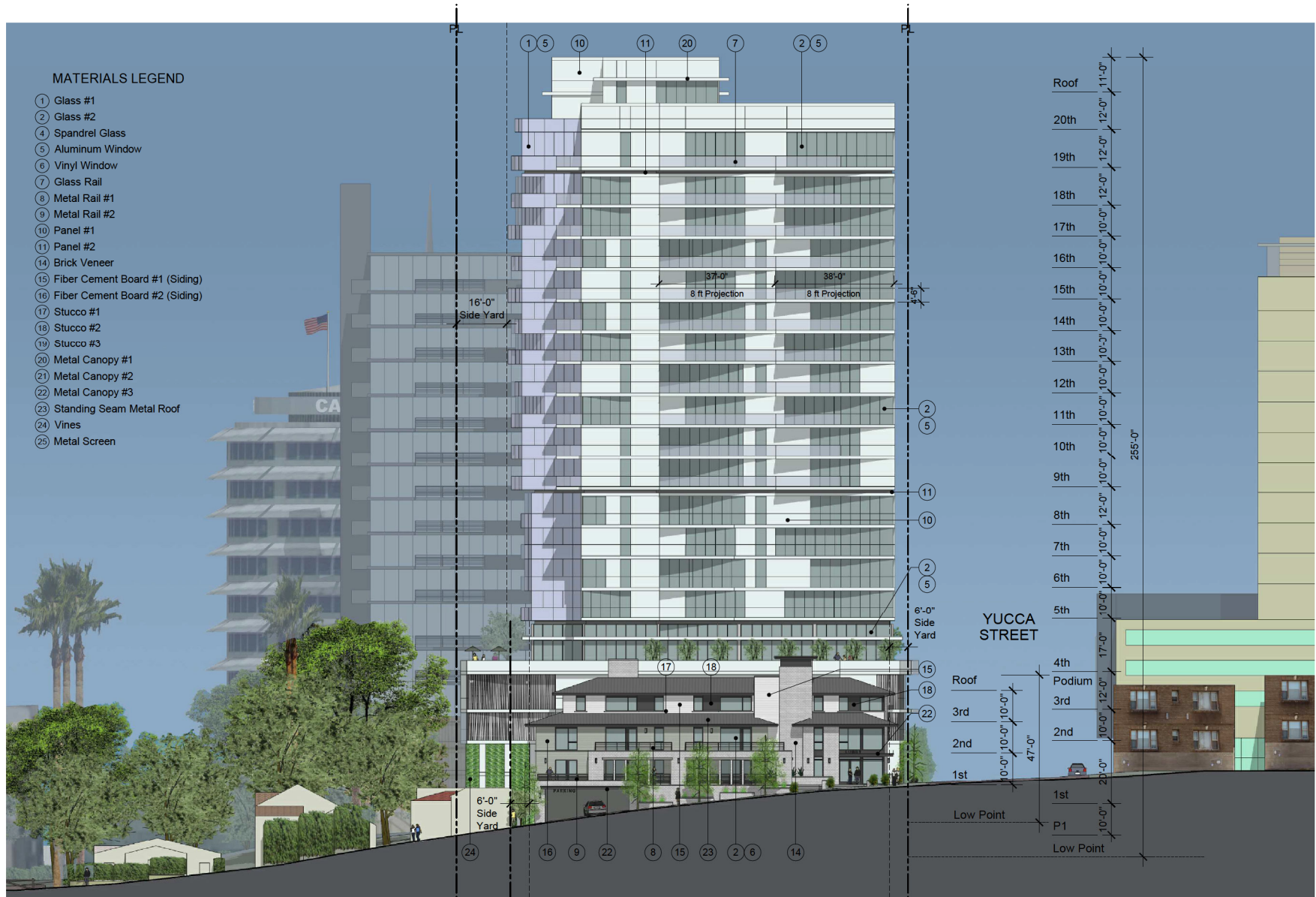




SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure II-11**  
West Elevation



SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project  
**Figure II-12**  
 East Elevation (Vista Del Mar Avenue)

## d) Parking and Access

The Project would provide a total of 436 vehicle parking spaces in Buildings 1 and 2. Parking for Building 1 would be provided within the six-level parking structure housed within its podium (two subterranean levels [P2 and P3]; two semi-subterranean levels [P1 and L1]; and two fully above-ground levels [L2 and L3]). The parking structure within Building 1 would provide 415 parking spaces (311 for residential uses, 79 for hotel uses, and 25 for commercial/restaurant uses). Parking for Building 2 would be provided in its two-level podium structure within the semi-subterranean level (P1) and one subterranean level (P2). The parking structure within Building 2 would provide 21 parking spaces for residential uses. Los Angeles Municipal Code (LAMC) requirements for vehicular parking are summarized below in **Table II-2, Project Vehicular Parking Code Requirements**.

Vehicular access to the Building 1 parking structure would be provided via Yucca Street and Argyle Avenue. Yucca Street would provide direct access to the ground level (Level 1) of Building 1. From the interior of the ground level of Building 1, a ramp would take vehicles up to the Level 2 parking (see Figure II-5). The Argyle Avenue access point would provide direct access to the P1 Level. Level 1 would provide only commercial parking. Commercial and hotel parking would be provided on the P1 and P2 levels. Residential parking would be made available on the 2<sup>nd</sup> and 3<sup>rd</sup> Levels and on the P2 and P3 Levels. Hotel self-parking would be available from the Argyle Avenue parking entry (P1 Level). Commercial/restaurant and hotel truck deliveries would also utilize the same ingress/egress ramp along Argyle Avenue at the P1 Level. Hotel and guest access would also be via the porte-cochere located at the sidewalk level on Yucca Street (see Figure II-5). It is anticipated that valet service would be available to hotel guests and Project Site visitors at the porte-cochere. Within the Building 1 parking structure, Project residents would access the restricted residential only parking areas via gate-controlled ingress/egress ramps.

Within Building 2, Project residents would access parking on the P1 and P2 Levels via a gate-controlled ingress/egress ramp located on the P1 Level along Vista Del Mar Avenue (see Figure II-5).

All parking lot egress ramps would be designed to include an audible and visible warning system (an exit alarm) to indicate that vehicles are approaching the Yucca Street and Argyle Avenue driveways to exit, to alert pedestrians, bicyclists, and other drivers that a vehicle is exiting before that vehicle is visible from the street or sidewalk.

Pedestrian access to the commercial/restaurant uses would be provided from various at-grade sidewalks along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. Access to the commercial/restaurant uses on Argyle Avenue and Yucca Street would be unrestricted during business hours, but public access would be discontinued after businesses have closed. Pedestrian access to the Project's residential uses would be restricted through the lobbies within Building 1 and Building 2 on the sidewalk levels.



**TABLE II-2  
PROJECT VEHICULAR PARKING CODE REQUIREMENTS**

<b>Residential</b>	<b># Units</b>	<b>Space/Unit<sup>a</sup></b>	<b>Parking Spaces</b>
<b>Residential Building 1</b>			
One Bedroom	99	1.5	148.5
Two Bedroom	88	2	176
Suite	10	2	20
<b>Residential Building 2</b>			
One Bedroom	5	1.5	7.5
Two Bedroom	8	2	16
<b>Total Residential Parking Required Before Bike Parking Replacement</b>			<b>368</b>
<b>Commercial/Restaurant</b>	<b>Square Feet</b>	<b>Spaces/500 s.f.<sup>b</sup></b>	<b>Parking Spaces</b>
Commercial/Restaurant	12,570	1	25
<b>Total Commercial/Restaurant Parking Required</b>			<b>25</b>
<b>Hotel</b>	<b>Rooms</b>	<b>Spaces/Room<sup>c</sup></b>	<b>Parking Spaces</b>
1–30 Rooms	30 Rooms	1 Space	30
31–60 Rooms	30 Rooms	0.5 Space	15
Over 60 Rooms	76 Rooms	0.33 Space	25
<b>Hotel</b>	<b>Square Feet</b>	<b>Spaces/500 s.f.<sup>b</sup></b>	
Hotel Meeting Space	4,600	1 Space	9
<b>Total Hotel Parking Required Before Bike Parking Replacement</b>			<b>79</b>
<b>TOTAL REQUIRED OFF-STREET PARKING BEFORE BIKE PARKING REPLACEMENT</b>			<b>472</b>
<b>Residential Parking Reduction for Bike Parking Replacement.<sup>d</sup></b>			
<b>(36 spaces = ~10% of total required spaces)</b>			<b>36</b>
<b>TOTAL REQUIRED PARKING AFTER BIKE PARKING REDUCTIONS</b>			<b>436</b>
<b>TOTAL PROVIDED OFF-STREET PARKING AFTER BIKE PARKING REPLACEMENT</b>			<b>436</b>

Notes: s.f. = square feet

<sup>a</sup> LAMC, Section 12.21.A.4(a) Off-Street Automobile Parking Requirements

<sup>b</sup> LAMC, Section 12.21.A.4.(x)(3).2 Parking Requirements for Hollywood Redevelopment Project Area, delineated by Ordinance No. 161,202

<sup>c</sup> LAMC, Section 12.21.A.4(b) Off-Street Automobile Parking Requirements – For Guest Rooms

<sup>d</sup> LAMC, Section 12.21.A.4(a) Off-Street Automobile Parking Requirements – New or existing automobile parking spaces required by the Code for all uses may be replaced by bicycle parking at a ratio of one automobile parking space for every four bicycle parking spaces provided. Notwithstanding the foregoing, no more than 20 percent of the required automobile parking spaces for nonresidential uses shall be replaced at a site. Automobile parking spaces for nonresidential projects or buildings located within 1,500 feet of a portal of a fixed rail transit station, bus station, or other similar transit facility, as defined by Section 12.24 Y., may replace up to 30 percent of the required automobile parking spaces with bicycle parking. Automobile parking spaces for residential projects or buildings located within 1,500 feet of a portal of a fixed rail transit station, bus station, or other similar transit facility as defined by Section 12.24 Y. may replace up to 15 percent of the required automobile parking spaces with bicycle parking.

Source: ESA, 2019.

Building 1 residents would also be able to gain access via a shared residential/hotel lobby within Building 1 on the ground level and via elevators at resident parking levels. Hotel access would be restricted through the use of a staffed hotel lobby (also shared with residential uses) on Level 1 and through the use of hotel key cards. Building 2 residential access would also be restricted through the use of key cards to a residential lobby.

### **e) Loading and Trash Removal**

Loading, recycling, trash removal, and collection for the residential, hotel, and commercial/restaurant uses within Building 1 would occur in designated areas within the interior areas of the P1 Level such that noise, odor, or other impacts to nearby residents would be minimized. Loading activities for the residential, hotel and commercial/restaurant uses would occur within the P1 Level of Building 1 in a designated 910 square-foot loading area near the parking entrance off of Argyle Avenue (see Figure II-4). For Building 2, recycling and trash collection for the residential uses would occur in a designated area within the P1 Level (see Figure II-4). Building 2 would not have a designated loading area within the interior of the building. Loading/deliveries for the residential uses would utilize dedicated residential freight elevators on the P1 Level of each building. Access to the loading and/or trash removal areas of both buildings would be restricted to daylight hours.

### **f) Open Space, Landscaping and Amenities**

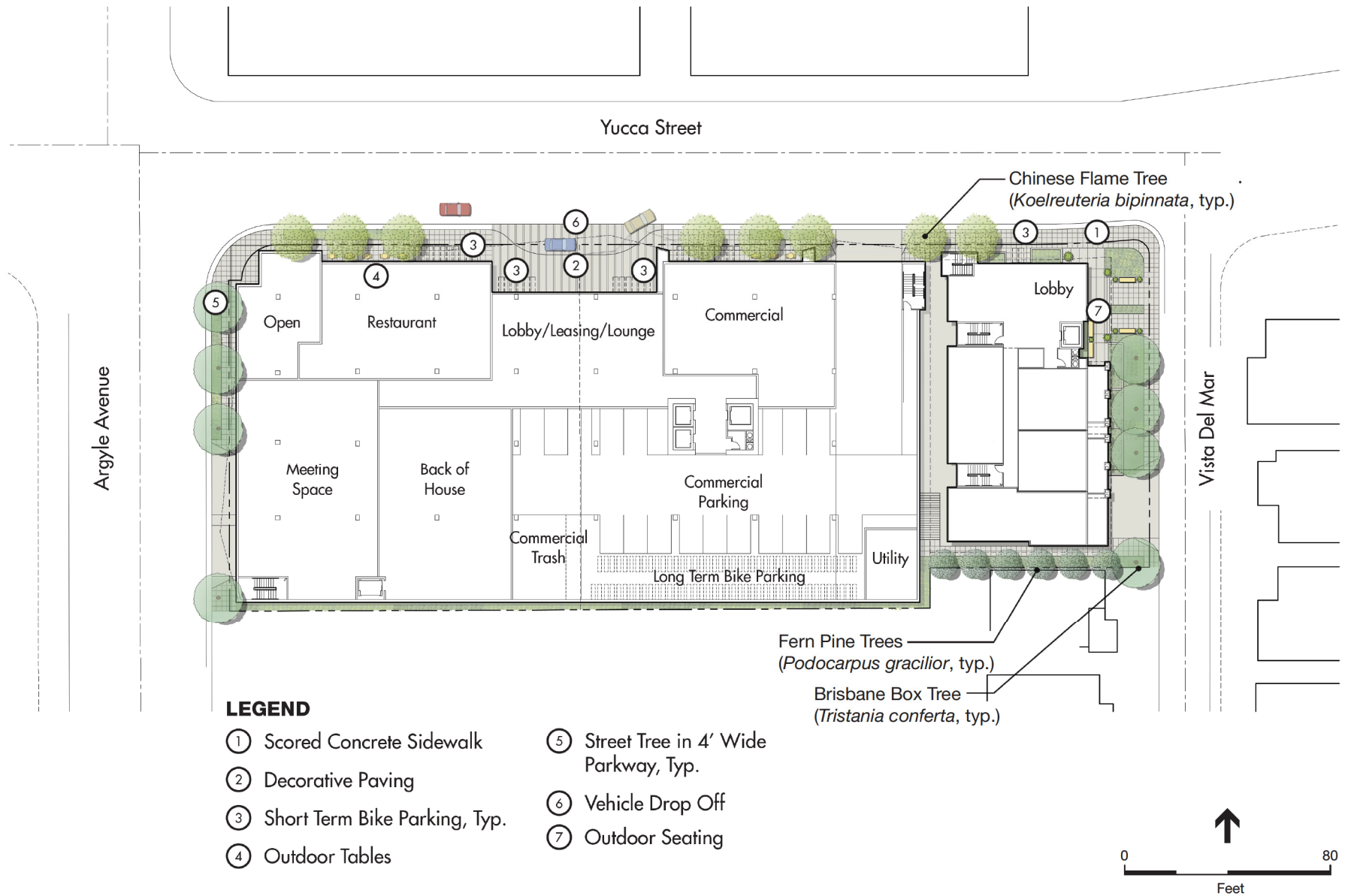
The Project would include various outdoor open spaces and landscape treatments, as discussed below. All of the open space areas would provide landscaping and detailed hardscape. Figure II-3, **Figure II-13, Landscape Plan – Ground Level**, **Figure II-14, Landscape Plan – 4<sup>th</sup> Level**, and **Figure II-15, Landscape Plan – 20<sup>th</sup> Level**, provide illustrations of the Project's proposed outdoor spaces and amenity features. Overall, the Project would provide a total of 24,350 square feet of open space.

#### **(1) Resident-Only Features**

Building 1 would include 8,500 square feet of private balconies. Building 2 would include 250 square feet of private balconies. Building 2 would further include an approximate 375 square-foot amenity space on Level 1 and, as shown on Figure II-14, an 875 square-foot roof garden on Level 4.

#### **(2) Hotel-Only Features**

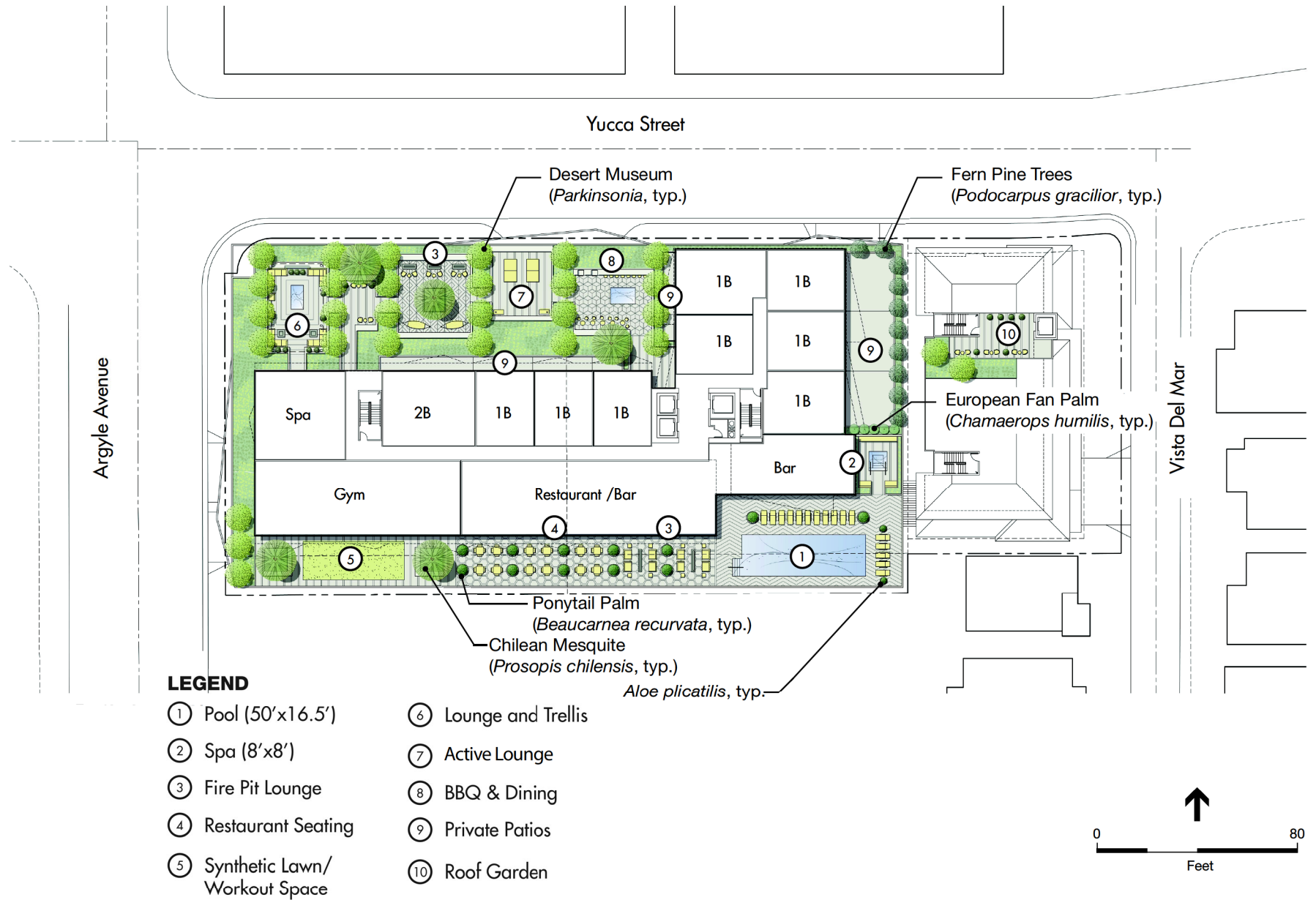
As shown on Figures II-6 and II-14, Building 1 would include an approximate 1,320 square-foot indoor spa facility for hotel guests only on Level 4.



SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

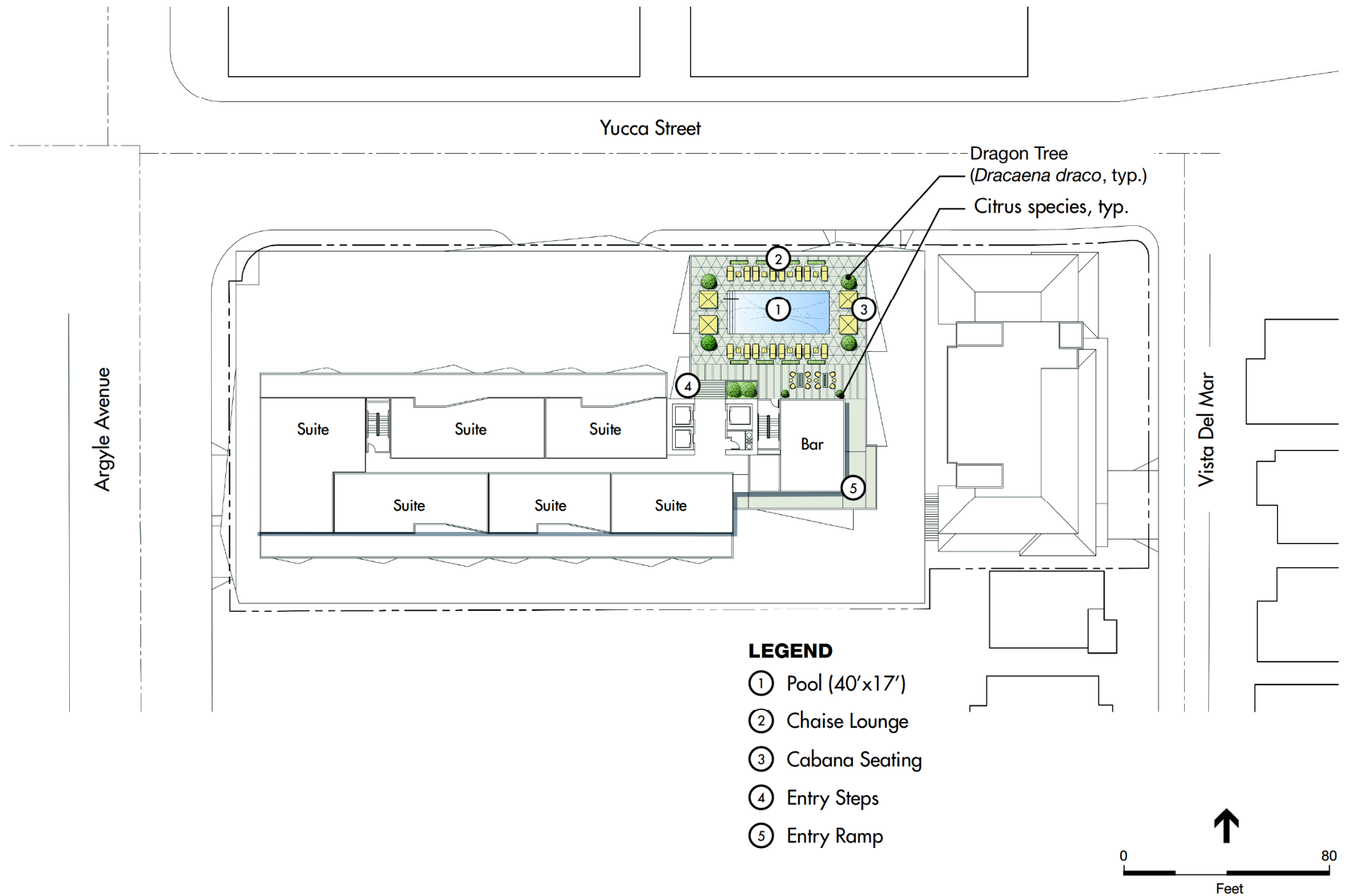
**Figure II-13**  
Landscape Plan – Ground Level



SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project  
**Figure II-14**  
 Landscape Plan - 4th Level





SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure II-15**  
Landscape Plan – 20th Level

### (3) Shared Features (Hotel and Residential)

As shown in Figure II-14, Building 1 would include an approximate 2,530 square-foot gym with an adjacent outdoor synthetic lawn/workout space, a 4,450 square-foot restaurant/bar with outdoor seating, a pool and a spa surrounded by a deck, and a 10,610 square-foot podium courtyard on Level 4 to be shared by both hotel guests and residents. The courtyard would be equipped with lounge seats, an active lounge, gas fire pit and lounge, BBQ, and dining tables and chairs. As shown in Figure II-15, Building 1 would further include a 3,740 square-foot pool/roof garden with a 920 square-foot bar on Level 20. Typically, the pools would be open from 6 a.m. to approximately 11 p.m.

### (4) Open Space Total

As described above, Building 1 would include the following open space areas: a 10,610 square-foot podium courtyard (Level 4); a 3,740 square-foot roof garden (Level 20); and 8,500 square feet of private residential balconies. Thus, Building 1 would provide a total of 22,850 square feet of open space. Building 2 would include 375 square-feet of amenity space on Level 1 (maximum 25 percent of required open space – 1,500 square feet x 0.25 = 375 feet); an 875 square-foot roof garden; and 250 square feet of private balconies. Thus, Building 2 would provide 1,500 square feet of open space. The outdoor open space areas for Buildings 1 and 2 are illustrated on Figures II-14 and II-15. Overall, the Project would provide a total of 24,350 square feet of open space, which would exceed the City's 24,150 square foot open space requirement, as discussed further in Section IV.G, Land Use and Planning, of this Draft EIR.

### (5) Landscape Plan

As stated above, Figure II-3 provides an overview of the outdoor spaces and landscape features on the various outdoor levels of the Project. Figure II-13, provides a detailed landscape plan that illustrates the proposed landscaping at the ground levels of Building 1 and Building 2. The exterior boundaries of the Project Site along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue would include a streetscape design allowing for pedestrians, potential café tables, parkway planters, and bike parking, as well as access to the porte-cochere. All of the open space areas would provide landscaping and detailed hardscape. Street trees would be planted along Yucca Street, Argyle Avenue and Vista Del Mar Avenue. Along both Argyle Avenue and Vista Del Mar Avenue, there would be four (4) Brisbane Box street trees each, and there would be approximately eight (8) Chinese Flame Trees along Yucca Street. Other trees such as Fern Pine, Desert Museum, Chilean Mesquite, and Ponytail Palm would be used to add verticality, structure, and color to the streetscapes and courtyards. The landscaping would be visible along the edges of the Project Site to passersbys on nearby roadways/sidewalks, and from higher elevations. The Project's landscape plan would include drought tolerant plants and a low water use landscape system including drip lines, bubblers, and weather-based controllers; and installation of turf instead of grass, where feasible.

Figure II-14 illustrates the Project's landscaping on the 4<sup>th</sup> level of Building 1 and the 4<sup>th</sup> Level roof garden of Building 2. Figure II-15 illustrates the Project's landscaping on the 20<sup>th</sup> level of Building 1.

### **g) Lighting and Signage**

New site signage would be used for building identification, hotel and commercial/restaurant tenant advertising/branding, wayfinding, and security markings. Signage would be designed and located to be compatible with the architecture and landscaping of the Project. Hotel and commercial/restaurant signage would be similar to other signage along the street frontages in the area. Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture. Any pole-mounted light fixtures located on-site would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive land uses, such as existing residential uses to the east and south of the site. The western portion of the Project Site, as shown in Figure II-2, is located within the Hollywood Signage Supplemental Use District of the Community Redevelopment Agency area. As such, the signage would be intended to serve the on-site Project activities, and would be designed to be consistent with the provisions of the Hollywood Signage Supplemental Use District. No off-site signage is proposed.

### **h) Site Security**

The Project would incorporate a 24-hour/seven-day security program to ensure the safety of its residents, hotel guests and site visitors. The buildings would include controlled access to residential units and the hotel in order to ensure the safety of site residents and hotel guests. Access to commercial/restaurant uses would be unrestricted during business hours, with public access discontinued after the commercial and restaurant businesses have closed. Site security would include the 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 the property. The Project design would also include lighting of entry-ways and public areas for site security purposes.

### **i) Sustainability Features**

The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code (CALGreen) and the City of Los Angeles Green Building Code and achieve United States Green Building Standards (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification under the LEED version 2009 (v3) or the Silver Certification under the LEED v4 rating system. The Project would incorporate measures and performance standards to support its LEED Gold or Silver Certification, which include but are not limited to the following: implementation of a construction waste management plan; exceeding Title 24 (2016) Building Standards Code requirements to reduce building energy costs by a

minimum of 5 percent; providing solar panels; use of high efficiency fixtures and appliances and other water conservation features; drought tolerant landscaping; dedicated on-site recycling area; and implementation of a transportation demand management program (TDM). These features and other sustainable features are further described in Section IV.E, Greenhouse Gas Emissions.

### j) **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*, which would allow the Project to qualify for streamlined environmental review under CEQA. The *Jobs and Economic Improvement Through Environmental Leadership Act* requires, among other things, the Project, upon completion to qualify for LEED Silver Certification, be located on an infill site, and not result in any net additional GHG emissions as determined by the Executive Director of CARB. The Project would qualify for LEED Silver 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 as a result of the purchase of emission offset credits (refer to analysis in Section IV.F, *Greenhouse Gas Emissions*, in this Draft EIR). The Environmental Leadership Development Project certification and other related documentation are provided in Appendix G of this Draft EIR.

## **7. Project Design Features**

The Project includes a number of Project Design Features (PDFs) that would reduce potential environmental impacts of the Project. The PDFs would be included in the Mitigation Monitoring Program required in association with certification of the EIR. The PDFs are listed in **Table II-3, Summary of Project Design Features**, and are discussed in detail in the technical sections indicated in the table. The PDFs were taken into account in the analysis of potential Project impacts.

## **8. Anticipated Construction Schedule**

Project construction may begin as early as 2020, with construction activities ongoing for approximately two years. Full build-out and occupancy could occur as early as 2022, but would be dependent on final construction timing which would determine the full build-out year.

**TABLE II-3**  
**SUMMARY OF PROJECT DESIGN FEATURES**

<b>Draft EIR Section &amp; Environmental Topic</b>	<b>Project Design Feature (PDF) #</b>	<b>Project Design Feature</b>
IV.A Aesthetics	PDF-AES-1	Any utility poles remaining at the Project Site will be removed and new lines for sewer, power, gas, and telecommunication systems will be located underground.
	PDF-AES-2	<b>Construction Fencing.</b> Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity of new buildings from view at the street level. The fence will be located along all perimeters of the Project Site with a minimum height of 8 feet. 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.
	PDF-AES-3	Outdoor lighting along public streets and associated with rooftop and courtyard lighting, decorative lighting and building security lighting, will be placed and directed, and of a fixture type, to minimize visibility from adjacent residential uses.
	PDF-AES-4	Although the Center Parcel is not located within the Hollywood Signage SUD, any proposed signs will be reviewed by the Department of City Planning for consistency with the Hollywood Signage SUD, as required for the West Parcel. Consistency includes ensuring that signs serve only on-site uses, are coordinated with the architectural design for the parcel, are appropriately scaled to the buildings on the parcel, and result in a visually uncluttered appearance.
	PDF-AES-5	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). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.
IV.B Air Quality	PDF-AQ-1	<p><b>Green Building Measures:</b> The Project will be designed and operated to exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.</p> <p>Green building measures will include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• The Project will be designed to optimize energy</li> </ul>

Draft EIR Section & Environmental Topic	Project Design Feature (PDF) #	Project Design Feature
		<p>performance and reduce building energy cost by a minimum of 5 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016).</p> <ul style="list-style-type: none"> <li>• The Project will be designed to optimize energy performance and reduce building energy cost by installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent.</li> <li>• The Project will provide a minimum of 30 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the Project Site.</li> <li>• The Project will reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption as required in LAMC Section 99.04.304. Reductions would be achieved through drought-tolerant/California native plant species selection, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), and/or smart irrigation systems (e.g., weather-based controls)</li> <li>• The Project will reduce indoor potable water use by a minimum of 20 percent compared to baseline or standard water consumption as defined in LAMC Section 99.04.303 by installing water fixtures that exceed applicable standards.</li> <li>• The Project would not include fireplaces in the residential buildings.</li> </ul>
IV.F Greenhouse Gas Emissions	PDF-GHG-1	<p><b>GHG Emission Offsets:</b> The Project will provide or obtain GHG emission offsets as required in the Project's Environmental Leadership Development Project certification and related documentation pursuant to the <i>Jobs and Economic Improvement Through Environmental Leadership Act</i></p>
	PDF-GHG-2	<p>At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label</p>

Draft EIR Section & Environmental Topic	Project Design Feature (PDF) #	Project Design Feature
		stating “EV CAPABLE” shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point
	PDF-GHG-3	At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number
IV.I Noise	PDF-NOI-1	Generators used during the construction process will be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.
	PDF-NOI-2	The Project will not use impact pile drivers and will not allow blasting during construction activities.
IV.K.1 Public Services – Fire Protection	PDF-FIRE-1	<p>The following Voluntary Fire and Emergency Medical Measures will be provided for the long term operations of the Project:</p> <ul style="list-style-type: none"> <li>• Owner supplied automated external defibrillators (AED's) will be provided on selected floors to be used by on-site security as necessary. Security personnel will be fully trained on the use and operation of the AED's; and</li> <li>• First aid training will be made available and encouraged for all building occupants, accessible on-line.</li> </ul>
IV.K.2 Public Services – Police Protection	PDF-POL-1	During construction, the Project Applicant will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting focused on the building site (no direct glare or light spill-over on neighboring properties), and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.
	PDF-POL-2	<p>During operation, the Project will incorporate a 24 hour/seven-day security program to ensure the safety of its residents and site visitors. The Project's security will include, but not be limited to, the following design features:</p> <ul style="list-style-type: none"> <li>• Installing and utilizing a 24-hour security camera network throughout the underground parking</li> </ul>

Draft EIR Section & Environmental Topic	Project Design Feature (PDF) #	Project Design Feature
		<p>structures, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage shall be maintained for at least 30 days, and such footage shall be provided to the LAPD, as needed;</p> <ul style="list-style-type: none"> <li>• Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed;</li> <li>• Maintaining staff on-site, including at the lobby concierge desk and within the car valet areas;</li> <li>• Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an electronic key fob specific to each user;</li> <li>• Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but 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 the property; and</li> <li>• Maintaining unrestricted access to commercial/restaurant uses during business hours, with public access (except for authorized persons) prohibited after the businesses have closed.</li> </ul>
	PDF-POL-3	<b>Landscaping.</b> Project landscaping will be designed so as not to impede visibility.
	PDF-POL-4	<b>Participation in Community Crime Prevention Efforts.</b> The Project residential association and commercial uses will participate in any community crime prevention efforts (e.g., Neighborhood Watch) that may be active in the Project area.
	PDF-POL-5	<b>Provision of Project Diagrams to LAPD.</b> Prior to the issuance of a Certificate of Occupancy, the Project Applicant will submit a diagram of the Project Site to the Los Angeles Police Department West Bureau Commanding Officer that includes access routes and any additional information requested by the Los Angeles Police Department as necessary to facilitate police response.
IV.L Transportation	PDF-TRAF-1	<b>Construction Traffic Management Plan.</b> A detailed Construction Traffic Management Plan including street closure information, detour plans, haul routes, and staging plans will be prepared and submitted to the Los Angeles Department of Transportation for review and approval. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities of the Project and



Draft EIR Section & Environmental Topic	Project Design Feature (PDF) #	Project Design Feature
		<p>other projects in the vicinity of the Project Site, if any, and will include, but not be limited to, the following elements as appropriate:</p> <ul style="list-style-type: none"> <li>• Advanced notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Prohibition of construction-related vehicles, including construction worker parking on nearby residential streets.</li> <li>• Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. In the event of a lane or sidewalk closure, a worksite traffic control plan shall route traffic or pedestrians around any such lane or sidewalk closures.</li> <li>• Maintenance of safe and convenient routes for pedestrians and bicyclists through such measures as alternate routing and protection barriers where appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to the nearby school.</li> <li>• Scheduling of construction-related deliveries, haul trips, worker trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to the nearby school.</li> <li>• Provision of detour plans to address temporary road closures during construction. Coordination of temporary road closures so as to occur outside of peak hours.</li> <li>• Minimize queueing of haul trucks and construction-related vehicles on adjacent streets.</li> <li>• Advanced notification of temporary parking removals and duration of removals.</li> <li>• Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.</li> </ul>
	PDF-TRAF-2	<p><b>Pedestrian Safety Plan.</b> The Project Applicant will plan construction and construction staging so as to maintain pedestrian access, including Safe Routes to Schools, on adjacent sidewalks throughout all construction phases. The Project Applicant will maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities will be adjacent to the Project Site and provide safe, accessible routes that</p>

Draft EIR Section & Environmental Topic	Project Design Feature (PDF) #	Project Design Feature
		replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways will be provided where pedestrians are exposed to potential injury from falling objects. The Project Applicant will keep sidewalks open during construction except when it is absolutely required to close or block the sidewalks for construction staging. Sidewalks will be reopened as soon as reasonably feasible, taking construction and construction staging into account. In the event that multiple projects are under construction in the area simultaneously that would affect the same sidewalk(s), the Project Applicant will coordinate with LADOT to ensure pedestrian safety is maintained.
IV.N.1 Utilities and Service Systems – Water Supply and Infrastructure	PDF-WS-1	Water conservation measures will include, but not be limited to: installation of waterless urinals; 1.75 gpm for shower heads; high efficient/demand water heater system; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible.

Source: ESA, 2019.

## 9. Necessary Approvals

It is anticipated that approvals required for the Project would include, but may not be limited to, the following:

- **Zone Change and Height District Change:** The West Parcel is currently zoned C4-2D-SN, the Center Parcel is currently zoned R4-2D, and the East Parcels are currently zoned [Q]R3-1XL. The Project would require a zone change and a height district change for the Center Parcel from R4-2D to C2-2, a height district change for the West Parcel to remove the D Limitation (C4-2D-SN to C2-2-SN), and a zone change for removal of the “[Q]” and a height district change for the East Parcels ([Q]R3-1XL to R3-2) pursuant to LAMC Section 12.32 in order to allow development of the Project.
- **Site Plan Review:** The Project would create, or result in an increase of, 50 or more dwelling units. As such, it would require Site Plan Review pursuant to LAMC Section 16.05.
- **Conditional Use Permit for FAR Averaging per LAMC Section 12.24-W.19.**
- **Conditional Use Permit:** Hotel: The Project would include a 136 room hotel within 500 feet of the R zone. As such, it would require a Conditional Use Permit (CUP) pursuant to LAMC Section 12.24.W.24.
- **Master Conditional Use Permit:** Alcoholic Beverages and Live Entertainment/Dancing: The Project would include the sale of a full line of alcoholic beverages and live entertainment / dancing in connection with the hotel and restaurant

portions of the Project. Thus, the Project would require a CUP pursuant to LAMC Section 12.24.W.1 and W.18.

- **Conditional Use Permit:** For a Major Development Project per LAMC Section 12.24-U.14. As part of this approval the Project would seek relief from applicable area regulations to allow the Project to utilize 6.6:1 FAR under LAMC Section 12.24-F.
- **Findings of consistency with the Hollywood Community Plan, and objectives in the Hollywood Redevelopment Plan Section 506.2.3, related to an increase in the floor area ratio.**
- **Concurrent consideration under the Multiple Approvals Ordinance of all entitlement requests per LAMC Section 12.36.**
- **Development Agreement.**
- **Owner Participation Agreement with CRA/LA.**
- **Vesting Tentative Tract Map per LAMC Section 17.15.**
- **Haul Route Permit, as may be required.**
- **Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, waivers of dedication requirements, demolition permits, grading permits, excavation permits, foundation permits, and building permits.**

State agencies, regional agencies, and City departments and commissions that may have jurisdiction over the Project may include, but are not limited to:

- Los Angeles Board of Public Works;
- Los Angeles Fire Department;
- Los Angeles Police Department;
- Los Angeles Regional Water Quality Control Board;
- South Coast Air Quality Management District;
- Los Angeles Department of Transportation; and
- City Bureau of Engineering.

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# Chapter III

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## General Description of Environmental Setting

Section 15125 of the State *CEQA Guidelines* requires that an EIR include a description of the existing environment. This chapter provides a general overview of the existing environmental setting for the Project. In addition, detailed information on existing conditions is provided for each environmental topic studied in Chapter IV, *Environmental Impact Analysis*. This chapter also provides an overview of the related projects that are to be considered when evaluating the Project's potential cumulative impacts.

### 1. Overview of Environmental Setting

#### a) On-Site Conditions

The Project Site is located on the south side of West Yucca Street between Argyle Avenue and North Vista Del Mar Avenue (addresses: 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue) in the Hollywood community of the City of Los Angeles, approximately five miles northwest of Downtown Los Angeles.

The approximate 1.16-acre Project Site is improved with one single-family residence, one duplex with a studio apartment over its detached garage, and three, two-story apartment buildings (43 existing multi-family/apartment units total) with associated carports and paved surface parking areas. The three, two-story apartment buildings located along Yucca Street and built in 1953 have carport parking at the rear with driveway access from Yucca Street, as well as access to a separate fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue. The 3,118 square-foot apartment building on the corner of Yucca Street and Argyle Avenue contains eight residential units. The two 6,236 square-foot apartment buildings farther to the east along Yucca Street contain 16 residential units each.

The single-family residence, the duplex with a detached garage, and the studio apartment over the garage front on Vista Del Mar Avenue. Just south of the fenced surface parking lot on Vista Del Mar Avenue is a 1,367 square-foot single-family residence built in 1920 (1771 North Vista Del Mar Avenue). Immediately adjacent and to the south of that residence is a 2,942 square-foot duplex built in 1918 (1765 North Vista Del Mar Avenue) (a former single-family residence). Above the duplex's detached garage is an approximately 500 square-foot studio apartment. The Project Site has been graded and

is generally flat, with the areas bordering Vista Del Mar Avenue and Argyle Avenue gently sloping downward from the north at Yucca Street to the south towards Carlos Avenue.

The Project Site currently contains a total of 44 existing residential units that would be demolished as part of the Project. Forty-three (43) of these existing units are subject to the City's RSO.<sup>1</sup> The RSO includes local regulations that implement the Ellis Act, a State law that regulates the transition of certain rental units to other uses.<sup>2</sup> Under the RSO, project applicants are required to provide relocation assistance to any existing tenants of RSO units that are replaced. For such tenants, applicants are required to provide relocation assistance in the form of a specified monetary payment set by the RSO that is meant to cover relocation expenses. In compliance with these requirements, existing tenants on the Project Site would be provided relocation assistance as required by the RSO.

The RSO also imposes replacement unit requirements where RSO units are replaced.<sup>3</sup> To comply with these requirements, the Project would provide 100 percent of its 210 residential dwelling units as RSO units.

## **b) Surrounding Uses**

The Project Site is bounded by Yucca Street, the Kimpton Everly Hotel, and three-story residential lofts to the north; North Vista Del Mar Avenue and one- and two-story single-family residences and duplexes to the east; vacant land (former Little Country Church of Hollywood) and one- and two-story single-family residences and duplexes followed by a five-story mixed-use residential and commercial development to the south; and Argyle Avenue and commercial and residential uses to the west, including the 18-story Argyle House Project (multi-family residential and commercial uses) at the southwest corner of Yucca Street and Argyle Avenue.

The Project Site vicinity is highly urbanized and generally built-out. The Project Site vicinity is part of the active regional center of Hollywood containing a mix of commercial, studio/production, office, entertainment, and residential uses. The Project Site is located in an area identified by the City as a Transit Priority Area, and is served by a network of regional transportation facilities. Various public transit stops operated by the Los Angeles County Metropolitan Transportation Authority (Metro) are located in close proximity to the Project Site. The nearest Metro Red Line subway station at Hollywood Blvd./Vine Street, is located approximately 0.13 mile southwest of the Project Site. Also, the Project Site area is served by bus lines operated by Metro and LADOT's DASH shuttles. For existing transit service and a summary of bus lines providing service in the Project Site vicinity, refer to Section IV.L, Transportation, of this Draft EIR. The Hollywood Freeway (US Route 101) is located approximately 200 feet north of the Project Site; Interstate 10 is located approximately five miles to the south; Interstate 110 is located approximately five miles

<sup>1</sup> RSO contained in LAMC Chapter XV.

<sup>2</sup> Cal. Gov't Code §§ 7060 et seq.

<sup>3</sup> LAMC §151.28.

to the southeast; Interstate 5 is located approximately five miles to the east; State Route 134 is located approximately five miles to the north; and Interstate 405 is located approximately eight miles to the southwest. There are a number of historical resources located in the Project Site vicinity, including the Capitol Records building to the west of the Project Site along Yucca Street, the vacant site of the former Little Country Church of Hollywood immediately south of the Project Site, and the Vista Del Mar Avenue/Carlos Historic District to the east of the Project Site, which includes two parcels within the Project Site along Vista Del Mar Avenue (1765 and 1771 Vista Del Mar Avenue).

### **c) Existing Conditions**

For more detailed descriptions of the existing conditions that are specific to each of the environmental issues analyzed in this Draft EIR, see Chapter IV, Sections IV.A through IV.N.

## **2. Related Projects**

CEQA requires that EIRs analyze cumulative impacts. As defined in the State CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. State CEQA Guidelines Section 15130(a) states that an EIR must discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3).

A project has “cumulatively considerable” or significant cumulative impacts when its incremental effects “are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects,” as defined in Section 15065(a)(3).

Section 15130 (a) (3) states that, “Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.” Furthermore, per Section 15120 (a)(2), when the combined cumulative impact associated with the project's incremental effect and the effects of other related projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. Per Section 15130 (a)(3), a lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of a mitigation measures designed to alleviate the cumulative impact. Per Section 15130 (a)(2), an EIR should not discuss impacts that do not result in part from the project evaluated in the EIR. Section 15130 (a) (3) requires that the lead agency identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

In addition, State CEQA Guidelines Section 15130(b) requires that the analysis of cumulative impacts reflect the severity of the impacts and the likelihood of occurrence, but that the discussion need not include as much detail as is provided for the effects attributable to the project alone. Instead, the discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified related projects contribute rather than the attributes of the related projects that do not contribute to the cumulative impact.

For an adequate discussion of significant cumulative impacts, the State CEQA Guidelines (Section 15130(b)(1)(A) and (B)) allow an EIR to determine cumulative impacts and reasonably foreseeable growth based on either of the following methods:

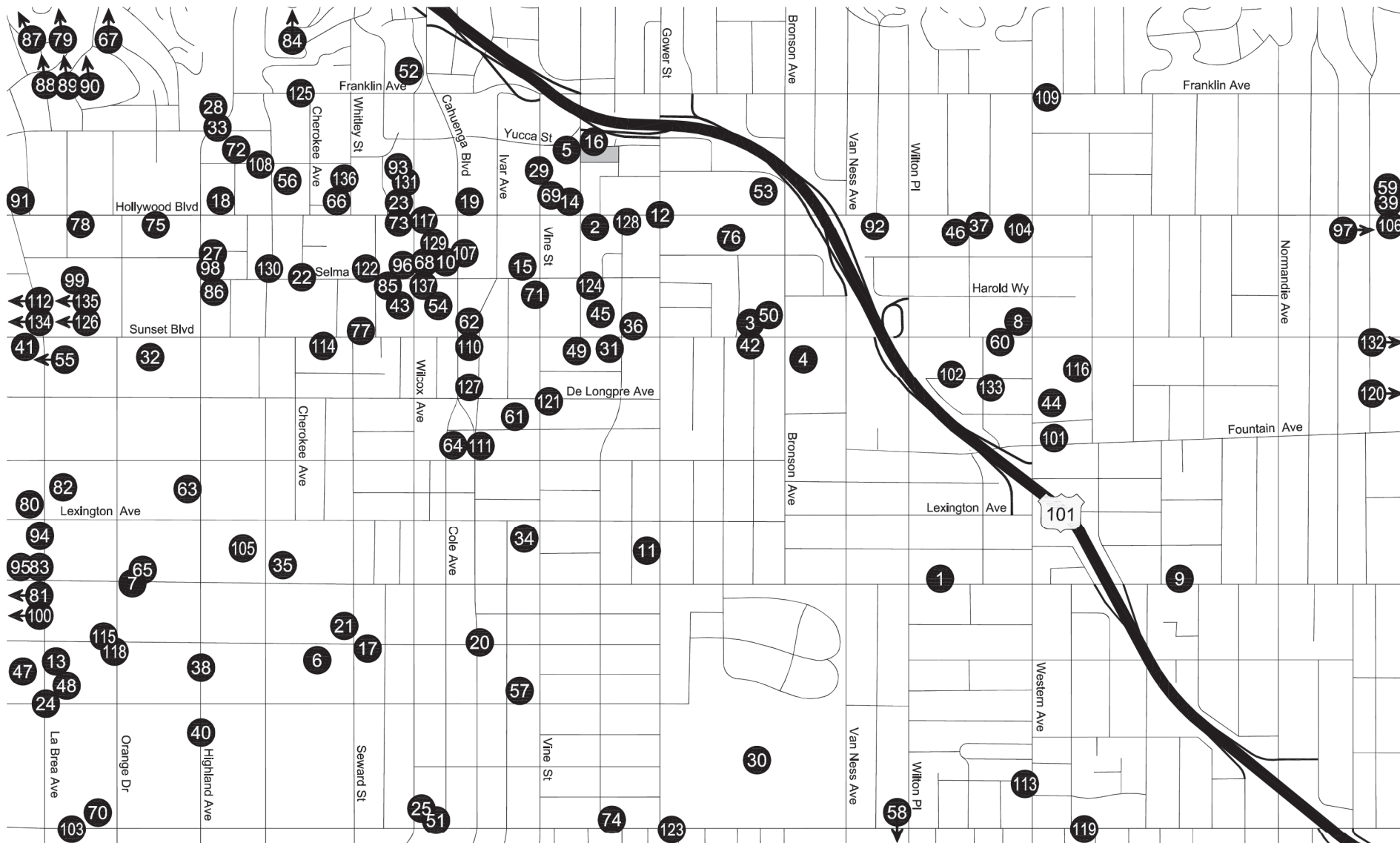
- A list of past, present, and probable future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For purposes of the cumulative impacts analyses for the Project, unless otherwise stated, the EIR has incorporated into its analyses a list of related projects for evaluating cumulative effects, and also incorporates a general ambient growth factor to traffic volumes. Accordingly, the cumulative analyses for traffic provide highly conservative estimates of future conditions since they include both elements listed in CEQA Guidelines Section 15130(b) for the purposes of developing the forecast.

Based on information provided by the City of Los Angeles Planning Department and Department of Transportation, as well as recent studies of projects in the area, the City's list of past, present and probable future related projects is provided in **Table III-1, Related Projects List**, with the location of each of the related projects shown in **Figure III-1, Related Projects Map**. Although the related projects listed in Table III-1 serve as the primary basis for evaluation of cumulative impacts, the approaches to these analyses vary for certain environmental issues. The cumulative analysis for each environmental issue is provided in the applicable section in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR.

Also, the City is currently in the process of updating the Hollywood Community Plan, which once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. The anticipated growth reflected by the related projects would occur in the early stages of the Hollywood Community Plan Update's 2040-time horizon, if the plan were to be finally adopted prior to the buildout of the related projects. As the Hollywood Community Plan Update has not been adopted, any analysis of its potential to increase growth within the Community Plan area by the Project's 2022 buildout date beyond what would occur in association with the reasonably foreseeable list of past, present and probable future projects relied on in this Draft EIR would at this point in time be purely speculative.





# LEGEND

- Project Site
- # Related Projects



SOURCE: Gibson Transportation Consulting, Inc., 2017

6220 West Yucca Project  
**Figure III-1**  
 Related Projects Map

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
1.	Paseo Plaza Mixed-Use	5651 W. Santa Monica Boulevard	Apartments	437 du
			Retail	378,000 sf
2.	El Centro (formerly BLVD 6200) Mixed-Use	6200 W. Hollywood Boulevard	Apartments	952 du
			Retail	190,000 sf
3.	Mixed-Use	5939 W Sunset Boulevard	Apartments	299 du
			Office	36,688 sf
			Retail	13,279 sf
4.	Sunset Bronson Studios	5800 W. Sunset Boulevard	Office	404,799 sf
5.	Argyle House (formerly Yucca Street Condos)	6230 W. Yucca Street	Condominiums	85 du
			Commercial	13,890 sf
6.	Hollywood 959	959 N. Seward Street	Office	240,000 sf
7.	Archstone Hollywood Mixed-Use Project	6911 W. Santa Monica Boulevard	Condominiums	231 du
			Retail	15,000 sf
8.	SunWest Project (Mixed-Use)	5525 W. Sunset Boulevard	Apartments	293 du
			Commercial	33,980 sf
9.	Mixed-Use	5245 W. Santa Monica Boulevard	Apartments	68 du
			Retail	51,674 sf
10.	Selma Hotel	6417 W. Selma Avenue	Hotel	180 rm
			Restaurant/Club	12,840 sf
11.	Hollywood Production Center	1149 N. Gower Street	Apartments/Condos	57 du

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
12.	Hollywood Gower Mixed-Use	6100 W. Hollywood Boulevard	Apartments	220 du
			Retail	4,580 sf
13.	Mixed-Use Office/Retail	936 N. La Brea Avenue	Office	88,750 sf
			Retail	12,000 sf
14.	Pantages Theater Office	6225 W. Hollywood Boulevard	Office	214,000 sf
15.	Selma & Vine Office Project	1601 N. Vine Street	Office	121,609 sf
			Commercial	2,613 sf
16.	Kimpton Everly Hotel (formerly Argyle Hotel Project)	1800 N. Argyle Avenue	Hotel	225 rm
17.	Seward Street Office Project	956 N. Seward Street	Office	130,000 sf
18.	Restaurant	6757 W. Hollywood Boulevard	Restaurant	17,717 sf
19.	Hotel & Restaurant Project	6381 W. Hollywood Boulevard	Hotel	80 rm
			Restaurant	15,290 sf
20.	Television Center (TVC Expansion)	6300 W. Romaine Street	Office	114,725 sf
			Gym	40,927 sf
			Dance Studio	38,072 sf
21.	Hollywood Center Studios Office	6601 W. Romaine Street	Office	104,155 sf
			Storage	1,970 sf
22.	Selma Community Housing	1603 N. Cherokee Avenue	Affordable Apartments	66 du
23.	Hudson Building	6523 W. Hollywood Boulevard	Restaurant	15,000 sf
24.	La Brea Gateway	915 N. La Brea Avenue	Supermarket	33,500 sf
			Apartments	179 du
25.	Residential	712 N. Wilcox Avenue	Apartments	100 du

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
26.	Restaurant & Deli	5500 W. Hollywood Boulevard	Restaurant	4,648 sf
			Deli	1,000 sf
27.	Mixed-Use	1610 N. Highland Avenue	Apartments	248 du
			Retail	14,710 sf
28.	Highland Avenue Indigo Hotel Project	1841 N. Highland Avenue	Business Hotel	100 rm
29.	Millennium Hollywood Mixed-Use Project (current Project proposed on this site is the Hollywood Center Project – see footnote below) <sup>4</sup>	1740 N. Vine Street	Apartments	492 du
			Hotel	200 rm
			Health Club	35,000 sf
			Office	100,000 sf
			Retail	15,000 sf
			Restaurant	34,000 sf

<sup>4</sup> At the time of preparation of the City approved list of related projects, the project at 1740 Vine Street was the Millennium Hollywood Mixed-Use Project. That Project has since been canceled, with the site currently being contemplated for the Hollywood Center Project, which is similarly also a high-rise mixed-use Project. The Hollywood Center Project is proposing approximately 872 dwelling units, 133 senior affordable units, approximately 30,200 square feet of retail uses, and nearly 34,000 square feet of public open space uses. Under a Hotel option, the Hollywood Center Project would replace 104 of the residential units with a 220-room hotel. Under either option, the contemplated mix-of uses would generate less traffic and corresponding traffic-related noise and air quality impacts than the Millennium Project primarily due to the removal of the office component. For purposes of this EIR analysis, the cumulative impacts analyses is based on the uses contemplated by the Millennium project, which again, results in a conservative assessment of traffic impacts. While it is acknowledged that the mix of uses varies, these variances do not materially change the findings in this EIR's cumulative impact analyses.

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
30.	Paramount Studios	5555 W. Melrose Avenue	Sound Stage	22,900 sf
			Production Office	635,500 sf
			Office	638,100 sf
			Retail	64,200 sf
31.	6200 W Sunset Boulevard	6200 W Sunset Boulevard	Apartments	270 du
			Restaurant	10,000 sf
			Retail	2,420 sf
32.	Apartments	1411 N. Highland Avenue	Apartments	90 du
33.	Apartment Project	1824 N. Highland Avenue	Apartments	118 du
34.	Hotel	1133 N. Vine Street	Hotel	112 rm
35.	The Lexington Mixed-Use	6677 W. Santa Monica Boulevard	Apartments	695 du
			Commercial	24,900 sf
36.	Columbia Square Mixed-Use	6121 W. Sunset Boulevard	Apartments	200 du
			Office	422,500 sf
			High-Turnover Restaurant	25,500 sf
			Retail	16,500 sf
			Health Club	15,000 sf
37.	Mixed-Use (High Line West)	5550 W. Hollywood Boulevard	Apartments	278 du
			Retail	12,500 sf
38.	Tutoring Center	927 N. Highland Drive	Students	100 students
			Employees	18 employees

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
39.	Kaiser Permanente Medical Office	4905 W. Hollywood Boulevard	Office	43,000 sf
40.	Starbuck w/ Drive Thru	859 N. Highland Avenue	Coffee Shop	806 sf
41.	Mixed-Use	7120 W. Sunset Boulevard	Apartments	44 du
			Commercial	2,900 sf
42.	Sunset & Gordon Mixed-Use	5935 W. Sunset Blvd.	Office	40,000 sf
			Retail	5,000 sf
			Condominium	311 du
			Restaurant	8,500 sf
43.	Sunset + Wilcox	1541 N. Wilcox Avenue	Hotel	200 rm
			Restaurant	9,000 sf
44.	Mixed-Use	1350 N. Western Avenue	Apartments	204 du
			Retail/Restaurant	5,500 sf
45.	Palladium Residences	6201 W. Sunset Boulevard	Apartments	731 du
			High-Turnover Restaurant	5,000 sf
			Retail	19,000 sf
46.	5600 W. Hollywood Boulevard	5600 W. Hollywood Boulevard	Apartments	33 du
			Commercial	1,300 sf
47.	925 La Brea Avenue	925 La Brea Avenue	Retail	17,000 sf
			Office	53,000 sf
48.	904 La Brea Avenue	904 La Brea Avenue	Apartment	169 du
			Retail	40,000 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
49.	6520 Sunset (Nickelodeon)	6520 W. Sunset Boulevard	Apartment	200 du
			Office	13,510 sf
			Other	13,471 sf
			Retail	4,700 sf
50.	Mixed-use	5901 Sunset Boulevard	Office	274,000 sf
			Supermarket	26,000 sf
51.	2014 Residential	707 N. Cole Avenue	Apartments	84 du
52.	Hotel	1921 Wilcox Avenue	Hotel	150 rm
			Restaurant	3,500 sf
53.	1717 Bronson Avenue	1717 N. Bronson Avenue	Apartments	89 du
54.	Cahuenga Boulevard Hotel	1525 N. Cahuenga Boulevard	Hotel	64 rm
			Commercial	1,500 sf
			Restaurant	3,550 sf
55.	Sunset Mixed-Use	7500-7510 W. Sunset Boulevard	Apartments	219 du
			Retail	30,000 sf
56.	Las Palmas Residential (Hollywood Cherokee)	1718 N. Las Palmas Avenue	Condominiums	29 du
			Apartments	195 du
			Retail	985 sf
57.	Mixed-Use	901 N. Vine Street	Apartments	85 du
			Retail	4,000 sf
			Restaurant	4,000 sf
58.	Apartments	525 N. Wilton Place	Apartments	88 du
59.	Hardware Store	4905 W. Hollywood Boulevard	Retail	36,600 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
60.	Target Retail Shopping Center Project	5520 W. Sunset Boulevard	Discount Store	163,862 sf
			Shopping Center	30,887 sf
61.	Academy Square	1341 Vine Street	Office	233,665 sf
			Apartments	250 du
			Commercial	49,135 sf
62.	Ivar Gardens Hotel	6409 W. Sunset Boulevard	Hotel	275 rm
			Retail	1,900 sf
63.	Mixed-Use	1233 N. Highland Avenue	Apartments	72 du
			Commercial	12,160 sf
64.	Mixed-Use	1310 N. Cole Avenue	Apartments	375 du
			Office	2,800 sf
65.	Mixed-Use at 6901 Santa Monica Blvd.	6901 Santa Monica Boulevard	Apartments	231 du
			Restaurant	5,000 sf
			Retail	10,000 sf
66.	Hyatt House Hotel & Retail	6611 W. Hollywood Boulevard	Hotel	167 rm
			Retail	10,500 sf
			Commercial	9,355 sf
			Theatre	1,634 sf
67.	Apartment	2864 N. Cahuenga Boulevard	Apartments	300 du
68.	TAO Restaurant	6421 W. Selma Avenue	Restaurant	17,607 sf
69.	citizenM Hotel	1718 Vine Street	Hotel	216 rm
			Restaurant	4,354 sf



**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
70.	Mixed-Use	6915 Melrose Avenue	Condominiums	13 du
			Retail	7,500 sf
71.	Sunset and Vine Mixed-Use	1538 N. Vine Street	Apartments	306 du
			Retail	68,000 sf
72.	Apartments and Retail	6758 W. Yucca Street	Apartments	270 du
			Retail	8,500 sf
73.	Restaurants & Multi-Purpose Entertainment Venue	6506 W. Hollywood Boulevard	Bar/Restaurant	13,000 sf
74.	Condos and Retail	5663 Melrose Avenue	Condominiums	96 du
			Retail	3,350 sf
75.	Retail and Office Building	6904 W. Hollywood Boulevard	Retail	29,900 sf
			Office	16,700 sf
76.	Residential Development	6001 W. Carlton Way	Condominiums	42 du
77.	Hotel	6600 W. Sunset Boulevard	Hotel	50 rm
78.	Apartments	7046 W. Hollywood Boulevard	Apartments	42 du
79.	Hollywood Central Park	Hollywood Freeway (US 101)	Park, Ampitheatre and Neighborhood Uses	38 acres
80.	Apartment and Retail	1201 N. La Brea Avenue	Retail	8,883 sf
			Apartments	8 du
81.	Movietown	7302 W. Santa Monica Boulevard	Apartments	371 du
			Office	7,800 sf
			Restaurant	5,000 sf
			Commercial	19,500

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
82.	Mixed-Use	1222 N. La Brea Avenue	Apartments	187 du
			Commercial/retail	19,559 sf
83.	Mixed-Use	7113 W. Santa Monica Boulevard	Apartments	184 du
			Commercial/Retail	13,350 sf
84.	John Anson Ford Theater	2580 Cahuenga Boulevard East	Theater	311 net new seats
			Restaurant	5,400 sf
			Office Employees	30 emp
85.	Hotel	6500 Selma Avenue	Hotel	70 rm
			Restaurant	4,320 sf
86.	Hollywood Crossroads	1540-1552 Highland Avenue & others	Residential	950 du
			Hotel	308 rm
			Office	95,000 sf
			Commercial/Retail	185,000 sf
87.	Gas Station and Convenience Store	3704 N. Cahuenga Boulevard	Gas Station Addition	1,700 sf
88.	Mixed-Use	3400 N. Cahuenga Boulevard	Apartments	53 du
			Office	11,385 sf
			Retail	5,000 sf
			Health Club	40,300 sf
89.	Condominium	3450 N. Cahuenga Boulevard	Condominiums	68 du
			Retail	59,000 sf
90.	NBC Universal Evolution Plan	100 Universal City Plaza	Hotel	1,000 rm
			Office	1,142,726 sf
			Commercial/Retail	634,460 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
91.	Mixed-Use	7107 Hollywood Boulevard	Apartments	410 du
			Restaurant	5,000 sf
			Retail	5,000 sf
92.	5750 Hollywood	5750 Hollywood Boulevard	Apartments	161 du
			Commercial	5,000 sf
93.	Wilcox Hotel	1717 Wilcox Avenue	Hotel	140 rm
			Retail	3,500 sf
94.	Mixed-Use	1145 La Brea Avenue	Apartments	32 du
			Commercial	1,287 sf
95.	Faith Plating	7143 Santa Monica Boulevard	Apartments	145 du
			Restaurant/Retail	7,858 sf
96.	Selma Hotel	6516 W. Selma Avenue	Hotel	212 rms
			Café	2,308 sf
			Lounge	11,148 sf
97.	Select @ Los Feliz (Mixed-Use)	4850 W Hollywood Boulevard	Apartments	101 du
			Restaurant	10,000 sf
98.	Highland Center Mixed-Use Project	1600 N Highland Avenue	Condominiums	248 du
			Retail	12,785 sf
99.	Lanewood Apartments	7045 W Lanewood Avenue	Apartments	43 du
100.	Mixed-Use	1041 Formosa Avenue	Office	300,000 sf
101.	Apartments	5460 W Fountain Avenue	Apartments	75 du
102.	Hollywood De Longpre Apartments	5632 De Longpre Avenue	Apartments	185 du
103.	Melrose Crossing Mixed-Use	7000 Melrose Avenue	Apartments	40 du
			Retail	7,565 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
104.	Mixed-Use	1657 N Western Avenue	Apartments	107 du
			Office	25,900 sf
			Retail	39,350 sf
105.	McCadden Campus (LGBT)	1118 N McCadden Place	Apartments	191 du
			Office	17,040 sf
			Youth/Senior Center	29,650 sf
106.	4900 Hollywood Mixed-Use	4900 W Hollywood Boulevard	Apartments	200 du
			Retail	25,000 sf
107.	Restaurant Expansion	1615 N Cahuenga Boulevard	Restaurant	10,270 sf
108.	Apartments	1749 Las Palmas Avenue	Apartments	70 du
			Retail	3,117 sf
109.	Mixed-Use	1868 N Western Avenue	Apartments	104 du
			Retail	13,500 sf
110.	6400 Sunset Mixed-Use	6400 Sunset Boulevard	Apartments	232 du
			Restaurant	7,000 sf
111.	Mixed-Use	1311 Cahuenga Boulevard	Apartments	369 du
			Retail	2,570 sf
112.	Gelson's Supermarket	1502 N Gardner Street	Supermarket	32,435 sf
113.	747 N Western Avenue	747 N Western Avenue	Apartments	44 du
			Retail	7,700 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
114.	6630 W Sunset Boulevard	6630 W Sunset Boulevard	Apartments	40 du
115.	1001 N Orange Drive	1001 N Orange Drive	Office	53,537 sf
116.	Sunset & Western	5420 W Sunset Boulevard	Apartments	735 du
			Commercial	95,820 sf
117.	Hollywood & Wilcox	6430-6440 W Hollywood Boulevard	Apartments	260 du
			Office	3,580 sf
			Retail	11,020 sf
			Restaurant	3,200 sf
118.	7007 W Romaine Street Office and Retail	7007 W Romaine Street	Office	48,137 sf
			Retail	3,555 sf
119.	Mixed-Use	4914 W Melrose Avenue	Live/Work Units	45 du
			Retail	3,760 sf
120.	Hospital Seismic Retrofit	1300 N Vermont Avenue	Office	30,933 sf
121.	Onni Group Mixed-Use Development	1360 N Vine Street	Apartments	429 du
			Commercial	60,000 sf
122.	1600 Schrader	1600 Schrader Boulevard	Hotel	168 rm
			Restaurant	5,979 sf
123.	Melrose & Beachwood	5570 W Melrose Avenue	Apartments	52 du
			Commercial	5,277 sf
124.	Modera Argyle	1546 N Argyle Avenue	Apartments	276 du
			Retail	9,000 sf
			Restaurant	15,000 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
125.	Montecito Senior Housing	6650 W Franklin Avenue	Apartments	68 du
126.	The Chaplin Hotel Project	7219 W Sunset Boulevard	Hotel	96 rm
			Restaurant	2,800 sf
127.	Godfrey Hotel	1400 N Cahuenga Boulevard	Hotel	220 rm
			Restaurant	2,275 sf
128.	6140 Hollywood	6140 Hollywood Boulevard	Hotel	102 rm
			Condominium	27 du
			Restaurant	11,460 sf
129.	Selma - Wilcox Hotel	6421 W Selma Avenue	Hotel	198 rm
			Bar/Lounge	2,379 sf
			Restaurant	3,600 sf
130.	Apartments	1601 N Las Palmas Avenue	Apartments	86 du
131.	1723 N Wilcox Residential	1723 N Wilcox Avenue	Apartments	68 du
			Retail	3,700 sf
132.	Kaiser Permanente Medical Center Hollywood	4760 Sunset Boulevard	Office	89,000 sf
133.	Mixed-Use	1370 N St Andrews Place	Office/Restaurant	66,680 sf
134.	7445 Sunset Grocery	7445 W Sunset Boulevard	Grocery Store	32,416 sf
135.	7225 Sunset Mixed-Use	7225 W Sunset Boulevard	Hotel	93 rm
			Restaurant	2,800 sf

**TABLE III-1  
RELATED PROJECTS LIST**

<b>No</b>	<b>Project Name</b>	<b>Address</b>	<b>Description/Land Use</b>	<b>Size</b>
136.	1719 Whitley Hotel	1719 N Whitley Avenue	Hotel	156 rm
137.	1550 Wilcox Office	1550 Wilcox Avenue	Office	36,000 sf

du – dwelling units

sf – square feet

rm – rooms

emp – employees

Source: City of Los Angeles Department of Transportation and Gibson Transportation Consulting, Inc., 2018.

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## **IV. Environmental Impact Analysis**

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### **A. Aesthetics**

#### **1. Introduction**

Senate Bill (SB) 743, codified within the California Environmental Quality Act (CEQA) Section 21099 et. seq., states that “Aesthetic (...) 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.” (Public Resources Code 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. 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 CEQA Guidelines Appendix G. However, ZI No. 2452 requires that projects in TPAs be evaluated for consistency with relevant City land use plans and regulations governing aesthetics.

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.<sup>1</sup> The City of Los Angeles (City) recognizes the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest, such as historic buildings, from public vantage points. The City considers such views to be “valued views” or “recognized views” in its 2006 City of Los Angeles CEQA Thresholds Guide (Thresholds Guide) and other City planning documents. 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. The analysis of view impacts evaluates the degree to which a Project may interrupt or block existing sightlines to a scenic resource from public vantage points such as scenic lookouts, trails, parks, and designated scenic highways or corridors. Existing views may be focused on a single feature such as a building or garden, or panoramic encompassing

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<sup>1</sup> City of Los Angeles, CEQA Thresholds Guide, Aesthetics, page A-1, 2006.

a broad field of view such as an urban skyline or distant mountain range or hilltop ridgelines.

### **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. The Project Site is not located within a view field of a state scenic highway. It is also minimally visible from the Mulholland Scenic Parkway, a City of Los Angeles designated roadway and the nearest scenic corridor to the Project Site.

### **c) Scenic Quality**

Scenic quality refers to the overall aesthetic character of an area or a field of view. 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. The focus of the scenic quality analysis is on the regulations governing scenic quality, for instance, the 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 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. SB 743 streamlines the review under CEQA for several categories of development projects, including infill projects in transit priority areas (TPAs). The bill adds Section 21099 to the CEQA Statute, California Public Resources Code Chapter 2.7, entitled Modernization of Transportation Analysis for Transit-Oriented Infill Projects. Pursuant to Section 21099(d)(1), “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.”<sup>2</sup> The provisions of SB 743 apply to projects located on a “... lot 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....and it is located within one-half mile of a major transit stop.”<sup>3</sup> As discussed in the Introduction, above, the Project meets the criteria set forth in SB 743 because it is (1) located within a TPA less than one-half mile from the Hollywood/Vine Metro Redline subway station and (2) proposes a mixed-use residential development within an established urban area. As discussed above, under SB 743, the Project is exempt from determinations of significance related to aesthetic effects, including view, scenic resources and scenic quality, and light and glare impacts that may exceed City thresholds. Section 21099(d)(2)(A) states that SB 743 does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. Section 21099(d)(2)(B) states that aesthetic impacts do not include impacts on historical or cultural resources. For the purpose of this EIR, with the exception of the evaluation of historic (scenic) resources, the Project’s aesthetic effects are voluntarily disclosed for informational purposes only and not for determining whether the Project will 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) was 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.

<sup>2</sup> Section 21009 (2)(B) clarifies that “For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.”

<sup>3</sup> Per definitions included in Section 21099 (a).

(a) *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, 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 Citywide 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.<sup>4</sup> 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.<sup>5</sup> 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 General Plan Framework 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).<sup>6</sup>

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.<sup>7</sup> "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

<sup>4</sup> City of Los Angeles, Department of City Planning, General Plan Framework Element: <http://cityplanning.lacity.org/cwd/framwk/fwhome0.htm>. Accessed February 2020.

<sup>5</sup> City of Los Angeles, Department of City Planning, General Plan Framework Element, Chapter 5: <http://cityplanning.lacity.org/cwd/framwk/chapters/05/05.htm>. Accessed November 29, 2018.

<sup>6</sup> City of Los Angeles General Plan Framework, Chapter 5, Goal 5A, Objective 5-5. at: <https://planning.lacity.org/cwd/framwk/chapters/05/05.htm>. Accessed November 29, 2018.

<sup>7</sup> City of Los Angeles General Plan Framework, Chapter 5 Goals, Objectives and Policies, Goal 5A at: <https://planning.lacity.org/cwd/framwk/chapters/05/05.htm>. Accessed November 29, 2018.

communities within the City.<sup>8</sup> 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.

(b) *Hollywood Community Plan*

The Project Site is located within the Hollywood Community Plan (Community Plan) area.<sup>9</sup> The Community Plan is one of the 35 community and district plans established throughout the City, which collectively comprise the Land Use Element of the City's General Plan and which are intended to implement the policies of the General Plan Framework. Community Plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land uses. Community Plan provisions that deal with urban design and aesthetics are addressed below. Those policies that deal with the form of the urban environment are discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR.

The Hollywood Community Plan, adopted in 1988 and effective as of April 2, 2014, does not provide direct policies regarding visual character. However, it does cross reference the Hollywood Redevelopment Plan, the provisions of which should be implemented in support of the Community Plan's goals. The Project Site is located within the boundaries of the Hollywood Redevelopment Plan.

(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 redevelopment activities and appoints successor agencies whose function is to wind down the ongoing financial obligations of the former agencies. However, ABx1-26 did not abolish existing redevelopment plans, including the existing Hollywood Redevelopment Plan. The land use authorities in the Redevelopment Plans remain in effect and continue to be administered by the appointed successor agency in the City, CRA/LA.<sup>10</sup> The Community Plan, which is applicable to development within the Hollywood Community area, cross references aesthetic policies in the Hollywood Redevelopment Plan (Redevelopment Plan). The provisions of Redevelopment Plan, which applies to the Project Site, support the Community Plan's goals. The goals of the Hollywood Redevelopment Plan as amended October 31, 2003, pertain to promoting a positive image for Hollywood through architectural and urban design standards, including standards for height, building setback, continuity of street façade, building 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

<sup>8</sup> City of Los Angeles General Plan Framework, Executive Summary at: <http://cityplanning.lacity.org/cwd/framwk/chapters/00/00.htm>. Accessed February 20, 2020.

<sup>9</sup> City of Los Angeles Department of City Planning. Hollywood Community Plan, December 13, 1988. Available at: <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed August 26, 2019.

<sup>10</sup> CRA/LA Memorandum dated June 12, 2102, Attachment A, Resolution No. 16 adopted June 21, 2012.

consistency with the Hollywood Redevelopment Plan is discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR.

(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 that would be applicable to aesthetic concerns include the following:

(i) *Lighting Regulations*

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

- Chapter 1, Article 2, Sec12.21 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 1, 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 1, 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 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 luminance's or insufficiently shielded light sources that is 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.<sup>11</sup>

<sup>11</sup> 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 (Hollywood Signage SUD) was originally established by Ordinance 176172 in October 2004 and amended under Ordinance 181340 effective beginning November 2010.<sup>12</sup> 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 Hollywood Signage SUD applies to commercial zones within the Hollywood Community and is applicable to the Project Site's West Parcel, which is currently zoned for commercial uses. The Project Site's parcels are illustrated in Figure II-2 in the Project Description. The Project Site's center and East Parcels are currently in residential zones and are not under the jurisdiction of the Sign Ordinance.

Ordinance No. 181,340 states the purpose of the ordinance, defines the types of signs that may occur within the Hollywood Signage SUD, and regulates the design of the signs by type. Compliance requires that signs serve only on-site uses, and 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 Hollywood Signage SUD 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 Hollywood Signage SUD) from the Director of City Planning.

(iii) *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, fourteen 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.

<sup>12</sup> City of Los Angeles Ordinance No. 181340, available at: [https://planning.lacity.org/Code\\_Studies/Other/HwdSignOrd.pdf](https://planning.lacity.org/Code_Studies/Other/HwdSignOrd.pdf); map available at: [http://cityplanning.lacity.org/Code\\_Studies/Billboards/HollywoodSignDistrict.pdf](http://cityplanning.lacity.org/Code_Studies/Billboards/HollywoodSignDistrict.pdf). Accessed August 26, 2019.

## **b) Existing Conditions**

### **(1) Scenic Vistas**

Existing views across the Project Site and surrounding area, discussed below, are based on field observations from surrounding public streets and the freeway. However, views of some of the existing conditions described below are available in Figures IV.A-2 through IV.A-11 in Subsection 3(d), *Project Impacts*, below.

#### *(a) Project Site as Viewed from the East*

The Project Site's Northern Yucca Street frontage, from east to west, consists of a fenced surface parking lot and three, two-story multi-family complexes. Utility poles and lines are also located along the north edge of the Project Site from this perspective. The utility poles, surface parking lot, and existing multi-family buildings have limited visual characteristics and contain appurtenances, such as satellite dishes and antennae, that are visible from the public street. The existing buildings do not possess significant architectural or historical character, as discussed in detail in Section IV.A.3.d, under Threshold b), below. As such, the Project Site along the Yucca Street frontage has limited visual quality and does not contain significant aesthetic or visual resources.

The Project Site is visible from the residences within the Vista Del Mar Avenue/Carlos Street Historical District located along the east side of Vista Del Mar Avenue. Under existing conditions, the views of the Project Site are primarily of the non-landscaped surface parking lot with its chain link fencing at the east edge of the Project Site and the east wall of the existing eastern most two-story apartment building. No panoramic views across the Project Site are available from the District or from Vista Del Mar Avenue. The single-family and duplex residences and one studio apartment over a garage on the Project Site's Vista Del Mar frontage (1765 and 1771 Vista Del Mar Avenue), also located within the Vista Del Mar Avenue/Carlos Street Historical District, are visible from adjacent offsite residences, including residences along the east side of Vista Del Mar within the District. However, as discussed in the Historical Assessment prepared for the Project, these on-site residences are severely altered from their original forms and are not exceptional, distinctive, outstanding, or singular examples of a type or style (see Appendix D of this Draft EIR). Thus, these buildings do not constitute a scenic resource as viewed from the District along Vista Del Mar Avenue.

The Hollywood Freeway is elevated in this area and therefore provides no direct views of ground areas or low-rise buildings at the Project Site.

#### *(b) Project Site as Viewed from the West*

The visual character of the Project Site as viewed from Argyle Avenue is of the two-story multi-family building, which comprises the entire property frontage. An iron fence is located along the property line, on the street side of the fill slope. The building front yard is approximately 10 feet deep along this street frontage.



(c) *Project Site as Viewed from the North*

Views of the Project Site from the north are primarily from the sidewalk at the north side of Yucca Street and from the two uses (the Kimpton Everly Hotel and the lofts building). The Hollywood Freeway, which abuts the north boundaries of these uses, blocks public views of the Project Site from locations to the north of the freeway. Views of the Project Site from Yucca Street include the existing surface parking lot, three two-story multi-family residences, minimal front yard setback (approximately eight feet), and above ground utility poles and lines.

(d) *Project Site as Viewed from the South*

Views of the Project Site from Vista Del Mar Avenue and the Vista Del Mar Avenue/Carlos Street Historical District are obscured by residential development along the west side of Vista Del Mar Avenue, partly due to the shallow front yards along the west side of Vista Del Mar Avenue resulting in the buildings built closer to the street. Residences in the Historical District at the east side of the street do not have views across the Project Site due to existing structures and trees. In addition, views of the Project Site from Vista Del Mar in the Historical District neighborhood to the southeast are obscured by landscaping, existing structures, a grade change, and dense landscaping on the abutting vacant parcel.

## (2) Scenic Resources

The General Plan 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 General Plan Framework Element are discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR. The General Plan 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 General Plan 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, nor or is the Project Site characterized by natural rocks, outcroppings, trees, or other natural features that are considered scenic resources.

## (3) Visual Character of the Project Site and Surrounding Area

(a) *Visual Character of the Project Site*

The Project Site currently contains a two-story multifamily apartment complex, constructed in 1953, a surface parking lot, one single-family residence and one duplex (with a studio apartment). The multi-family complex fronts onto Yucca Street and the single-family residence and duplex fronts onto Vista Del Mar Avenue. The parking lot is located at the corner of Yucca Street and Vista Del Mar Avenue. The existing apartment complex on Yucca Street features three, pastel-colored (pink, green, and yellow) stucco buildings. The middle and eastern of the three buildings provide gated courtyards that are

centered on the buildings' Yucca Street frontages. The ground levels are at grade with Yucca Street and, as such, pedestrian access is provided directly from the sidewalk (no stairs). The westernmost of the three buildings is oriented toward Argyle Avenue, with pedestrian access restricted just to Argyle Avenue. Because of the drop in elevation to the south of Yucca Street, staircases are provided to access the westerly building's ground levels along Argyle Avenue. The three apartment buildings have an approximately nine-foot setback from the Yucca Street sidewalk. A 24-inch high vine-covered wall marks the edge of the sidewalk and shade tolerant plants are located along the north edge of the complex. The 24-inch-high concrete wall continues along Argyle, where it is unplanted and painted to match the westernmost building (pink). Metal bar fencing surmounts the 24-inch-high concrete wall. Because of the gradient of the setback between the sidewalk and the building ground level, the slope along the Argyle Avenue frontage is minimally landscaped. The complex is served by two gated driveways off Yucca Street, located between the buildings. The eastern driveway serves as a one-way entrance and the western driveway serves as a one-way exit. A free-standing carport-style parking structure is located along the south edge of the Project Site. Three utility poles and overhead lines are located along the Yucca Street frontage.

The on-site residences along the Project Site's Vista Del Mar Avenue frontage (1765 and 1771 Vista Del Mar Avenue) are located within the Vista Del Mar Avenue/Carlos Street Historic District, in the block bordered by Vista Del Mar on the west, Carlos Street on the south, Gower Street on the west, and Yucca Street on the north. The contributing residences to the Vista Del Mar Avenue/Carlos Street Historic District include one- and two-story dwellings constructed in the Craftsman style between 1910 and 1923. Both 1765 and 1771 Vista Del Mar Avenue were identified as contributors to the District in 1984 and are also listed in the California Register as contributors. Character-defining features of the District include one to two-story residences designed in the Craftsman or Arts and Crafts style with the exception of a Spanish Colonial style residence. In the City's 2010 SurveyLA, a 2010 Historic Resources Survey for the Hollywood Redevelopment Project Area, 1765 Vista Del Mar was also identified as a contributor to the district, while it was recognized that 1771 Vista Del Mar had been altered since it was last surveyed in 1994 and was given a status code of 6Z, meaning the building was found ineligible for national, State, and local listing. The 1765 Vista del Mar residence has however, not been delisted and remains on the California Register. However, evaluation of both 1765 and 1771 Vista Del Mar Avenue in the Historic Assessment Report concludes that both residences have been severely altered, such that they no longer retain their historic integrity, are not singular examples of a type or style associated with and the early settlement of Hollywood, and are not identified with historic events or personages and are, therefore no longer eligible at the national, State, or local levels as contributors to the District. Therefore, these buildings are not considered historical resources.

The Project Site is characterized by a grade change from south to north of approximately 15 feet along the Project Site's approximately 130-foot Argyle Avenue frontage. The Project Site's approximately 350-foot frontage along Yucca Street is relatively flat, although it drops slightly to the west. On-street parallel parking is provided along Yucca

Street; however, no landscaping or other separation is provided between the sidewalk and street. No street trees, sidewalk lighting or other pedestrian amenities are present. No unique visual resources associated with natural habitat, landform, or vegetative resources are present on the Project Site. Under existing conditions, the proximity of the Hollywood Freeway and the Gower Street eastbound off-ramp at the corner of Yucca Street and Vista Del Mar contribute high activity, glare, and other aesthetic effects within the immediate Project neighborhood.

(b) *Visual Character of the Surrounding Area*

The highly urbanized Hollywood area includes a mix of retail, hotel, office, entertainment, and residential uses. The area surrounding the Project Site includes a mixture of older development and new and proposed mid-and high-rise buildings intermixed with historic structures and lower and medium-density residential and commercial uses. The Little County Church property, which has been vacant since the church was destroyed by fire in December 2007, adjoins the Project Site, directly to the south. The property contains remnant flower gardens, vines, shrubbery, and trees associated with the former church and prior A.G. Bartlett estate. Before the fire, the church building was identified as City of Los Angeles Historic Cultural Monument No. 567.

The visual quality of the community within a few block radius of the Project Site is being influenced by the many new and proposed development projects in the immediate area, including the existing Eastown multi-use development at the northeast corner of Hollywood Boulevard and Argyle Avenue.

The 16-story, 225-room Kimpton Everly Hotel (1800 Argyle Avenue) is located at the northeast corner of Argyle Avenue and Yucca Street, directly to the north of the Project's Building 1. Two older two-story, brick multi-family loft buildings and surface parking lot are also located at the north side of Yucca Street, directly across Yucca Street from the Project Site. The Kimpton Everly Hotel and the loft buildings are bounded by the Hollywood Freeway right-of-way (ROW) at their north property lines. The 18-story Argyle House mixed-use is located directly west of across Argyle Avenue from the Project Site.

As described above, along Yucca Street to the east of the Project Site is the northerly edge of the Vista Del Mar/Carlos Historical District. The Historical District is bounded by Yucca Street on the north, Vista Del Mar Avenue on the west, Carlos Street on the south, and Gower Street on the east. Between Vista Del Mar and Gower Street, the north side of Yucca Street is occupied by the Hollywood Freeway's eastbound Gower Street off-ramp and freeway ROW. The Vista Del Mar Avenue/Carlos Street Historic District, which continues to the east of Vista Del Mar Avenue is currently identified as being comprised of 16 properties eligible for the National Register and is listed in the California Register. However, as analyzed in the Chapter IV.C and in the Project Historical Resources Assessment, attached as Appendix D of this Draft EIR, not all of the 16 originally listed buildings retain status as contributors to the Vista Del Mar/Carlos Historical District, including the buildings at 1765 and 1771 Vista Del Mar Avenue.

The south side of Yucca Street is developed with a gated surface parking lot (at the southeast corner of Yucca Street and Vista Del Mar Avenue) for St. Stephens Episcopal Church, the church, and a two-story apartment building at the southwest corner of Yucca Street and Gower Street. St. Stephens Episcopal Church comprises the majority of the street front between Vista Del Mar and Gower Street.

The 18-story, 85-unit Argyle House mixed-use project at 6230 Yucca Street, is located at the southwest corner of Argyle Avenue and Yucca Street directly to the west of the Project's Building 1. The historical 13-story Capitol Records Building is located directly to the west of the Argyle House mixed use in the block bounded by Argyle Avenue, Yucca Street, Vine Street, and Hollywood Boulevard. Other office buildings generally associated with the entertainment industry are located to the west of Vine Street to the west of the Capitol Records Building site. A Los Angeles Department of Water and Power (LADWP) facility, which is fenced and behind an approximately 12-foot-high concrete wall, is located at the northwest corner of Yucca Street and Argyle Avenue, directly to the northwest of the Project Site.

In addition to the Capitol Records Building, other nearby historical buildings in the Project Site vicinity include the Hollywood Pantages Theatre (6233 Hollywood Boulevard), which is located along Argyle Avenue to the south of the Capitol Records site approximately one and one-half blocks to the southwest of the Project Site. The historical Guaranty Building/Allstate Title Building (6331 Hollywood Boulevard) and Security Trust & Savings (6381-85 Hollywood Boulevard) are located directly to the west of the Pantages Theatre and slightly farther from the Project Site.

Easttown, a 535-unit component of the El Centro mixed-use development, is located to the south of the Project Site, between Carlos Avenue and Hollywood Boulevard. Phase II of the El Centro development, consisting of an approximately 507-unit, seven-story complex, is located to the south of Hollywood Boulevard directly south of the Easttown development. Also to the south of the Project Site is the 13-story W Hotel and residences. The W Hotel features a broad rooftop sign along Argyle Avenue, consistent with the Hollywood Sign Ordinance.<sup>13</sup> Also to the south of the Project Site are the 20-story 6255 Sunset Building between Vine Street and Argyle Avenue; the 22-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.

Many buildings along the Hollywood Boulevard and Sunset Boulevard corridors exhibit an array of rooftop, "tall wall," and other vivid wall signs, such as supergraphic and digital signage. Street banners along these corridors support entertainment venues, provide additional color, and create a vivid reference to Hollywood's entertainment industry. Sidewalk landscaping, setbacks for public art, plazas, and other gathering spaces are

<sup>13</sup> Ordinance 181340 (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.

minimal within the older commercial district. Utility lines are underground along most streets within the local surroundings. However, above ground utility lines and poles occur along Yucca Street, Carlos Street, and Gower Street, to the north of Hollywood Boulevard.

The Hollywood Freeway, which is located one-half block to the north of the Project Site, is elevated in the vicinity of the Project Site. The elevated roadbed accommodates underpasses at Argyle Avenue, near the Project Site; Franklin and Vine Avenues, to the west of the Project Site; and Gower Street, to the east of the Project Site. No underpass is provided for Vista Del Mar Avenue, which terminates near the freeway at Yucca Street. Because the freeway is elevated and, because the topography rises toward the north, the freeway is an existing, dominant visual feature at the Project Site and in the surrounding neighborhood. The Vista Del Mar Avenue/Carlos Street Historic District, both along Vista Del Mar Avenue and along Yucca Street between Vista Del Mar Avenue and Gower Street directly faces the elevated freeway and the eastbound off-ramp to Gower Street.

The “faux Norman” seven-story Hollywood Tower/La Belle Tour (6200 Franklin Avenue) apartment building, constructed in 1928, is located at the north side of the Hollywood Freeway directly across from the Project Site. The building features a prominent neon “Hollywood Tower” sign oriented toward the freeway and the Project Site. The building is listed as a historical monument in the National Register. Land uses to the north of the Freeway predominantly are comprised of neighborhoods of new and older single- and multi-family residential uses and community-serving commercial uses along main streets. A gas station and mini-mall are located at the intersection of Franklin Avenue and Argyle Avenue, just to the north of the freeway.

No State of California-designated scenic highways are located in the Project Site vicinity. The City-designated scenic highways nearest to the Project Site include Los Feliz Boulevard, located approximately one mile to the northeast; Mulholland Drive, located approximately 1.3 miles to the northwest; and Laurel Canyon Boulevard, located approximately 2.8 miles to the west of the Project Site.<sup>14</sup>

#### (4) Light and Glare

The Project Site is located within the highly urbanized Hollywood community consisting of dense hotel, commercial, and residential development. Motor vehicle traffic on local streets and on the Hollywood Freeway greatly contribute to the ambient light and glare within the community. In addition, land uses, such as theaters, offices, hotels, restaurants, residential towers, illuminated signs, and pole-mounted signs also contribute to an existing high ambient light and glare level along Argyle Avenue, Vine Street, Hollywood Boulevard, and other commercial streets. Existing on-site illumination is low and light levels along Vista Del Mar Avenue are generally low and consistent with a single-family residential neighborhood. Street and pedestrian lighting, which consists of single street

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<sup>14</sup> State of California Scenic Highway Mapping System. [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways). Accessed December 12, 2016.

lights at the intersections of Yucca Street/Argyle Avenue and Yucca Street/Vista Del Mar Avenue, is minimal. Wall-mounted flood lights are located at the multi-family complex's two gated driveway entrances on Yucca Street and at the single, mid-block pedestrian entrance. No pole lights are evident in the surface parking area.

Daytime glare is generally associated with sunlight reflected from buildings with large continuous expanses of highly reflective materials. Activities that would be sensitive to daytime glare from reflected sunlight include motorists traveling on the adjacent roadways and people working in adjacent buildings. In the Project Site vicinity, sensitive receptors to nighttime glare or high ambient light levels include the existing residences located along Vista Del Mar Avenue, the multi-family residential use directly north of the Project Site to the north of Yucca Street, the Eastown residential complex to the south of Carlos Street, as well as the new Argyle House mixed-use to the west of Argyle Street, directly west of the Project Site. However, because ambient light levels are generally lower in single-family neighborhoods, these uses are generally more sensitive to contrasting light levels or direct source glare.

#### (5) Shading

Though the City does not have regulatory requirements related to shade and shadow impacts of new development, shade and shadow conditions and impacts are not considered significant impacts under CEQA in Transit Priority Areas under SB 743 and under the CEQA Guidelines

### 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 non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings (public views are those that are experienced from publically vantage point); or 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 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

(a) *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.

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

- Applicable guidelines and regulations regarding scenic quality.

(c) *The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements; and*

- Applicable guidelines and regulations.

(d) *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 is based on the evaluation of the simulated composite photographs provided for the visual character analysis, which depict existing and illustrate future conditions. The intent of the evaluation of views across the Project Site from various distances and directions is to determine if valued visual resources exist and if so, whether views of the identified valued visual resources would be substantially blocked or diminished as a result of Project development. The evaluation further considers whether the Project would enhance viewing conditions through the creation of new resources and whether the Project includes design characteristics that would offset or mitigate specific effects.

The L.A. CEQA Thresholds Guide requires that an analysis of a Project's visual resources effects include analysis of its effects on views from such public places as designated scenic highways, corridors, parkways, roadways, bike paths and trails. A viewing location is a location that affords views of scenic resources that are available to the public from those locations. 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." *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal.App. 4<sup>th</sup> 249, 279 (2006). Scenic resources impacts within a TPA are not considered significant under PRC Section 21099(d)(1) and ZI No. 2452.

### (2) Scenic Resources

The evaluation of the scenic resources, which includes but is not limited to trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway, identifies the potential for scenic resources within the Project Site and surrounding neighborhood that could be directly or indirectly impacted by the Project. Although the evaluation of scenic resources is informational in character, the identification and evaluation of historical or cultural resources as scenic resources is not exempt from analysis or the determination of significance, as required under ZI 2452. The methodology for analysis of aesthetic impacts on historical resources is based on the evaluation in Section V.B.3, *Indirect Impacts*, of the *Historical Resources Assessment Report*, included as Appendix D of this EIR. The *Historical Resources Assessment Report* and potential Project impacts on historical resources is further evaluated in detail in Section IV.C, *Cultural Resources*, of this EIR. Scenic Resources impacts within a TPA are not considered significant under PRC Section 21099(d)(1) and ZI No. 2452.



### (3) Regulations Governing Scenic Quality

The Project is compared to regulations governing scenic quality which Hollywood Community Plan policy, the Planning and Zoning Code lighting and street replacement requirements, and other regulatory documents such as the HSSUP, as applicable.

#### (a) *Scenic/Visual Quality*

The potential for a project to degrade the surrounding community under Threshold (c) is not applicable to projects in urbanized areas, such as the Project. Nevertheless, the discussion of scenic quality impacts is provided for informational purposes only.

The evaluation of visual character pertains to the degree and nature of contrast between the Project and its surroundings. The existing visual quality of the Project Site is compared to the expected (future) appearance of the Project Site and the Project area in order to determine whether the visual character of the area would be degraded. Factors such as changes in the appearance of the Project Site, building height and massing, setbacks, landscape buffers and other features are taken into account. The analysis of visual character is based on the evaluation of photographs depicting existing conditions and simulated composite photographs showing future conditions for representative locations within a range of distances and variety of directions from the Project Site. The evaluation further considers whether the Project would enhance visual character through the creation of new resources and whether the Project includes design characteristics that would offset or mitigate specific effects.

#### (b) *Shading*

Though the City does not have regulatory requirements related to shade and shadow impacts of new development, analysis of shade and shadow impacts is not required for the Project under CEQA.

### (4) Light and Glare

The analysis of light and glare identifies the location of light-sensitive and glare-sensitive land uses and describes the existing ambient conditions on the Project Site and in the Project Site vicinity. The analysis describes the Project's proposed light and glare sources, and the extent to which Project lighting, including illuminated signage, would spill from the Project Site onto light-sensitive areas. The analysis also describes the direction in which the light would be focused, and the extent to which the Project would illuminate sensitive land uses. The analysis also considers the potential for sunlight to reflect off Project building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities or adversely affect the character of an area. 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

The following Project Design Features (PDFs) are incorporated into the Project:

**PDF AES-1:** Any utility poles remaining at the Project Site will be removed and new lines for sewer, power, gas, and telecommunication systems will be located underground.

**PDF AES-2: Construction Fencing.** Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity of new buildings from view at the street level. The fence will be located along all perimeters of the Project Site with a minimum height of 8 feet. 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.

**PDF-AES-3:** Outdoor lighting along public streets and associated with rooftop and courtyard lighting, decorative lighting and building security lighting, will be placed and directed, and of a fixture type, to minimize visibility from adjacent residential uses.

**PDF-AES-4:** Although the Center Parcel is not located within the Hollywood Signage SUD, any proposed signs will be reviewed by the Department of City Planning for consistency with the Hollywood Signage SUD, as required for the West Parcel. Consistency includes ensuring that signs serve only on-site uses, are coordinated with the architectural design for the parcel, are appropriately scaled to the buildings on the parcel, and result in a visually uncluttered appearance.

**PDF-AES-5:** 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). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.

## d) Analysis of Project Impacts

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

As discussed above, the City's Thresholds Guide describes view resources as "focal" or "panoramic."<sup>15</sup> "Focal views" are views that focus on a particular object, scene, setting, or feature of visual interest; "panoramic views" or vistas focus on a large geographic area,

<sup>15</sup> City of LA CEQA Thresholds Guide, Section A.2, Obstruction of Views, page A.2-1.

where the field of view can be wide and extend into the distance. Panoramic view resources in the area include (1) views of the Hollywood Hills, (2) views of the Hollywood Sign, (3) views of the Hollywood skyline, including of the Capitol Records Building, and (4) and views of the Downtown skyline all as viewed from public locations. Focal view resources include views of historic buildings in the Project Site vicinity, such as the Capitol Records Building, the Hollywood Pantages Theatre, the Guaranty Building/Allstate Title Building, the Security Trust & Savings Building, and the nearby Hollywood Tower Hotel. The Project's Building 1 (255 feet tall) component, and to a lesser degree, Building 2 (47 feet tall), would be taller than other development in the immediate area and would be visible from locations along the Hollywood Freeway, Argyle Avenue, Yucca Street, and other streets in the immediately surrounding neighborhood. Because the Project would be visible from public streets and highways, it has the potential to affect scenic views. No public parks in the Project Site vicinity have focal views of scenic resources across the Project Site. Views toward or across the Project Site are shown in the simulations of the future Project. **Figure IV.A-1**, *Map of View Locations*, depicts eleven representative locations that have views of the Project Site. During preparation of the simulations, the 18-story Argyle House project to the west of the Project Site was under construction. However, construction has since been completed and the new building is currently occupied.

### (1) Views Across the Project Site from the East

The development of the Project would alter the views of the Project Site from the existing three two-story apartment buildings, surface parking lots, a duplex and single-family residence to a new three-story multifamily building and a 20-story mixed use building. Existing and simulated views of the Project Site depicted in **Figure IV.A-2**, *View Location 1: Existing and Future West-Facing Views from Yucca Street - Just West of Vista Del Mar Avenue*, above, show that View Location 1 does not provide a panoramic view across the site or broad or focal views of nearby historical buildings in the area, such as the Capitol Records Building, the Hollywood Pantages Theatre, the Guaranty Building/Allstate Title Building, and Security Trust & Savings Building. Former partial views of the Capitol Records Building are currently blocked by the Argyle House building. However, existing west-facing public views across the Project Site area are available from westbound Hollywood Freeway, as shown in **Figure IV.A-3**, *View Location 2: Existing and Future Views from Westbound I-101 Freeway*. From some locations, the elevated Hollywood Freeway provides panoramic views of the Hollywood Hills and Hollywood skyline. However, because of the continuous movement of the freeway motorist, the freeway does not allow extended time for the enjoyment of focal views of individual scenic resources, such as specific historical buildings in the downtown Hollywood community. Moreover, a view from a moving car on a freeway is not considered a valued vantage point. In View Location 2 near Vista Del Mar Avenue, intervening traffic and concrete barrier walls also do not allow clear views of historical buildings in the background.



SOURCE: Open Street Map, 2017.

6220 West Yucca Project  
**Figure IV.A-1**  
 Map of View Locations





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure IV.A-2**

View Location 1: Existing and Future West-Facing Views  
from Yucca Street - Just West of Vista Del Mar





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

### Figure IV.A-3

View Location 2: Existing and Future Views  
from Westbound I-101 Freeway

To the east, between Sunset Boulevard and Hollywood Boulevard, the westbound freeway is below grade and does not allow for panoramic views; however, farther to the east, as viewed from the freeway or other higher points in the City having views of the downtown Hollywood skyline, the Project would form a component of the skyline and, as such, would not substantially block west-facing views of the Hollywood Hills or skyline.

Because clear views of specific scenic resources within the Hollywood community are not available across the Project Site from the freeway and no public local views of scenic resources are available from the Yucca Street/Vista Del Mar Avenue intersection, the Project would not substantially block west-facing views of scenic resources. Although implementation of the Project would alter the appearance of the Project Site from low-rise residential uses to low- and high-rise multi-family residential and mixed use buildings, scenic vistas are not available across the Project Site from vantage points represented in Figures IV.A-2 and IV.A-3. In addition, the Project would feature buildings that are consistent with the character and scale of existing buildings in the background and surrounding area and, as such, would not detract from the quality of the scenic vistas in the area, but would rather add an attractive, modern new visual element to the Hollywood Skyline. Therefore, the Project would not have a substantial adverse effect on scenic vistas from these vantage points.

## (2) Views Across the Project Site from the West

The development of the Project would alter the views of the Project Site from the existing three two-story apartment buildings, surface parking lots, a duplex and single-family residence to a new three-story multifamily building and a 20-story mixed use building. Existing and simulated views of the Project Site from the west from the intersection of Yucca Street and Argyle Avenue, from Yucca Street at Vine Street, and from the eastbound Hollywood Freeway are depicted in **Figure IV.A-4**, View Location 3: *Existing and Future East-Facing Views from Argyle Avenue at Yucca Street*; **Figure IV.A-5**, View Location 4: *Existing and Future East-Facing Views from Yucca Street at Vine Street*; and **Figure IV.A-6**, View Location 5: *Existing and Future Views from the Eastbound Hollywood Freeway*. As shown in these simulations, no visual or scenic resources, such as Downtown Los Angeles or Hollywood community skylines are visible across or in the background of the Project from these neighboring public streets or the freeway. Views across the Project Site of the Vista Del Mar/Carlos Street Historic District, for instance, are blocked by the existing, intervening development on the Project Site. Implementation of the Project would not have a substantial adverse effect on the existing views across the Project Site from these vantage points. This neighborhood, and other scenic resources, are not visible through the scenic corridor. Therefore, Vista Del Mar Avenue/Carlos Street Historic District (a scenic resource) is not visible across the Project Site from public streets to the west. As such, no views of existing scenic resources in this historic district would be blocked by the Project. Because the Project would not block views of scenic resources or vistas, and would be consistent with the scale and character of existing buildings in the background and surrounding area, it would not cause a substantial adverse effect on scenic vistas from the vantage points represented in Figures IV.A-4, IV.A-5, and IV.A-6.





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

# **Figure IV.A-4**

View Location 3: Existing and Future East-Facing Views from Argyle Avenue at Yucca Street





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

# **Figure IV.A-5**

View Location 4: Existing and Future East-Facing Views  
from Yucca Street at Vine Street





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure IV.A-6**

View Location 5: Existing and Future Views  
from the Eastbound Hollywood Freeway

### (3) Views Across the Project Site from the North

The development of the Project would alter the views of the Project Site from the existing three two-story apartment buildings, surface parking lots, a duplex and single-family residence to a new three-story multifamily building and a 20-story mixed use building. Existing and simulated views of the Project Site from the north are represented in **Figure IV.A-7, View Location 6: Existing and Future South-Facing Views from Argyle Avenue North of the Hollywood Freeway, and **Figure IV.A-8, View Location 7, South-Facing View from Vista Del Mar Avenue at Yucca Street. As shown, in Figure IV.A-7, no scenic or aesthetic resources, such as mountain or high-rise skyline are visible across, or in the background of, the Project Site View Location 6. Views from the north, farther to the north of the freeway, could encompass the Hollywood skyline because of the higher elevation to the north. However, the Project, which would be a component of such panoramic views, would not block views of the skyline because the Project would be a component of that skyline, and because of the relative location of the Project Site to the east of Argyle Avenue (many of Hollywood's high-rise buildings are located to the west of the Argyle Avenue) and distance between the Project Site and a more distant viewer.****

Implementation of the Project would partially block some portion of the panoramic views of the Hollywood skyline from the adjacent Kimpton Everly Hotel to the north, including views from the hotel's 16<sup>th</sup> -story component and 5<sup>th</sup>-story pool deck. Although views would be partially blocked, views from the Kimpton Everly Hotel represent private views that are not protected under the applicable threshold standard, which applies to views from public locations. In addition, the Project's 20-story component would be set back 52 feet along Yucca Street across from the Kimpton Everly Hotel, creating a slimmer profile of the east/west-oriented section of the tower as viewed from Yucca Street and the neighboring hotel. The break in the horizontal plane along the tower face on Yucca Street would reduce the visual scale of the building experienced at the pedestrian level. Although the Project would alter the appearance of the Project Site from low-rise residential uses to low- and high-rise multi-family residential and mixed use buildings, it would not block scenic vistas from public vantage points represented in Figures IV.A-7 and IV.A-8 and would be consistent in scale and character to other background and adjacent buildings in the surrounding area. Therefore, the Project would not have a substantial adverse effect on scenic vistas from these areas.

### (4) Views Across the Project Site from the South

The development of the Project would alter the views of the Project Site from the existing three two-story apartment buildings, surface parking lots, a duplex and single-family residence to a new three-story multifamily building and a 20-story mixed use building. **Figure IV.A-9, View Location 8: Existing and Future North-Facing Views from Argyle Avenue at Hollywood Boulevard**; **Figure IV.A-10, View Location 9: Existing and Future North-Facing Views from Gower Street at Hollywood Boulevard**; and **Figure IV.A-11, View Location 10: Existing and Future North-Facing Views from Vista Del Mar Avenue at Carlos Avenue**, depict the visibility of the Project Site from areas to the south.





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

# **Figure IV.A-7**

View Location 6: Existing and Future South-Facing Views  
from Argyle Avenue North of the Hollywood Freeway





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

# **Figure IV.A-8**

View Location 7: Existing and Future South-Facing Views  
from Vista Del Mar Avenue at Yucca Street





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure IV.A-9**

View Location 8: Existing and Future North-Facing Views  
from Argyle Avenue at Hollywood Boulevard





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

### Figure IV.A-10

View Location 9: Existing and Future North-Facing Views  
from Gower Street at Hollywood Boulevard





Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

# Figure IV.A-11

View Location 10: Existing and Future North-Facing Views  
from Vista Del Mar Avenue at Carlos Avenue



As shown in Figure IV.A-9, the Hollywood Freeway and Hollywood Hills are visible in the Argyle Avenue background. The Hollywood Hills and the Hollywood sign, the latter of which is a City of Los Angeles Historic-Cultural Monument, are also visible through the Gower Street corridor in Figure IV.A-10. However, foreground commercial and mixed-use buildings block distant public views across the Project Site from Hollywood Boulevard through either of these street corridors.

As shown in Figure IV.A-11, existing development along Vista Del Mar Avenue, or within the Project Site, currently block northwest-facing focal or panoramic views across the existing Project Site from the Vista Del Mar Avenue/Carlos Street Historic District from the vantage point of a viewer standing on a street. Therefore, because no panoramic views, or scenic vistas, to the northwest are currently available from the Historic District, the Project would not adversely affect views to the north or northwest from this area.

The Project Site abuts a densely vegetated private property to the south that is the site of the former Little Country Church. Because of dense vegetation and the topographic rise to the Project Site, no north-facing focal or panoramic views of visual resources (beyond the Project Site) are available across the existing Project Site from Carlos Street or Vista Del Mar Avenue. As such, implementation of the Project would not adversely impact views of existing background scenic resources, such as the Hollywood Tower/La Belle Tour. Although implementation of the Project would alter the appearance of the Project Site from low-rise residential uses to low- and high-rise multi-family residential and mixed use buildings, scenic vistas are not available across the Project Site from vantage points represented in Figures IV.A-9, IV.A-19, and IV.A-11. It would also be consistent in scale and character with other existing high-rise development in Hollywood's commercial zones. Because no public scenic vistas are currently available across the Project site and because the Project would be similar to existing newer development in the area, as well as contribute new landscaping and revitalized street front, the Project would not have a substantial adverse effect on scenic vistas from these public vantage points.

#### (5) Views Across the Project Site from Hollywood Bowl Overlook

More distant views of the Project Site from the Hollywood Bowl Overlook are presented in **Figure IV.A-12**, *View Location 11: Existing and Future East-Facing Views from the Hollywood Bowl Overlook*. This vista point on Mulholland Drive provides panoramic views of the Los Angeles Basin, including views of the Downtown skyline and clusters of high-rise buildings in the Hollywood community. As shown in Figure IV.A-12, the Project's 20-story tower would be a component of the view field, and would not block views of buildings in the Hollywood community or the Downtown skyline, but would rather simply become a component of the skyline. The Project would thus not disrupt the skyline and would not be visually prominent within the overall field of view, and therefore would not adversely affect views from this public vantage point. As such, implementation of the Project would not have a substantial adverse effect on the existing scenic vista across the Project Site from this vantage point.



Existing



Future

SOURCE: Togawa Smith Martin, Inc., 2017

6220 West Yucca Project

**Figure IV.A-12**

View Location 11: Existing and Future East-Facing Views  
from the Hollywood Bowl Overlook

## (6) Scenic Vistas Conclusion

The Project would not substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views. It would not block panoramic views that occur in the background of open street corridors (such as views of the Hollywood Sign through north-facing Gower Street). Existing residences within the Vista Del Mar Avenue/Carlos Street Historic District and surrounding residences do not currently have views of the Capitol Records Building or other scenic resources across the Project Site. **The Project would not have a substantial adverse effect on a scenic vista. Furthermore, with the exception of the Project's aesthetic impacts on historical resources as analyzed herein, below, and in Section IV.C of the Draft EIR, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not significant pursuant to SB 743 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 scenic highway?***

### (1) Construction Impacts

Neither the Project Site nor the general vicinity of the Project Site contains scenic resources such as trees or rock outcroppings (there are two small street trees along the Project's Argyle Avenue ROW and three palm trees along the Project's Vista Del Mar ROW, but these trees are common varieties and do not have any notable physical characteristics or features and are therefore not considered to be scenic resources). While the Project Site is located within and adjacent to the Vista Del Mar/Carlos Historic District, the Project Site is not located along a City-designated or State-designated scenic highway or associated view corridor.<sup>16</sup> Two on-site residential buildings, located at 1765 and 1771 Vista del Mar Avenue within the Historic District, would be demolished for the proposed development.

As discussed in detail in the *Historical Resources Assessment Report*, included as Appendix D of this EIR, these two properties have been highly altered and, as a result, no longer contribute to the historical character of the District. As concluded in *Historical Resources Assessment Report*, the demolition of the residences would not result in the removal of any key physical characteristics of the Historic District that convey its historical significance. Therefore, Project construction would not substantially damage historic buildings that contribute to the area's historic value.

The Project Site also abuts the Little Country Church property to the south. The Little Country Church property was the site of the former A.G. Bartlett estate residence, which was demolished in the early 1920's. The Little Country Church that subsequently

<sup>16</sup> Los Angeles Department of City Planning, Mobility Plan 2035, an Element of the General Plan. Available at: [https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility\\_Plan\\_2035.pdf](https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf). Accessed June 14, 2018.

occupied the site was identified as City of Los Angeles Historic Cultural Monument No. 567 and was noted for its garden setting left over from the original estate. The historic church no longer exists on the property due to having been destroyed by the 2007 fire and the remains having been subsequently removed, and though the remnant flower gardens, vines, shrubbery, and trees give the site a natural, open space quality, merely being open space does not in and of itself render the site a scenic resource. Moreover, construction activity, such as the movement of haul trucks, concrete trucks, and deliveries would be focused on Yucca Street and would not encroach directly upon or damage any of the existing features of this open lot. No other historic or scenic resources occur on or adjacent to the Project Site. As discussed in the Initial Study (attached to this EIR as Appendix A), the Project Site is not located along a City- or State-designated scenic highway and as such is not considered to be within the view field of a scenic highway. Project construction would not directly or substantially damage scenic resources. Furthermore, with the exception of the Project's aesthetic impacts on historical resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not significant pursuant to SB 743 and ZI No. 2452.

## (2) Operation Impacts

The Project Site is not located along a City-designated or State-designated scenic highway or associated view corridor, and would thus result in no operational impacts on any such resources.

The Project's Building 2 would replace the existing surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue and two residential properties, including a single-family residence, duplex and studio apartment over a garage. In particular, the Project would replace the buildings at 1765 and 1771 Vista Del Mar avenue, which are identified as being part of the Vista Del Mar/Carlos Historical District, a historic resource. Character-defining features of the District include one to two-story residences along Vista Del Mar and Carlos Street that were designed primarily in the Craftsman or Arts and Crafts style. A Spanish Colonial-style residence located just to the south of the Project Site also identified as being part of the historic district is the exception.

As previously discussed, because the two, on-site residential buildings within the District experienced substantial changes or remodels over the years outside of the identified periods of significance for the district in a manner that causes the buildings to have lost the ability to convey the character-defining features and historic associations of the district, they are determined to be non-contributory to the Historical District and are not considered historic for the purposes of this analysis. As such, their removal as part of the project does not constitute the loss of an historical resource, so the Project would not result in any damage to and would thus not have a direct aesthetic impact on any historic resources.

Nonetheless, the Project would be developed adjacent to and across from single-family homes located within the Historic District and therefore present the potential in the first instance to result in an indirect aesthetic impact on this historic resource. To address this

impact, the conceptual design of Building 2 is a contemporary adaption of the traditional craftsman style. Its scale, design and height – three-stories, stepped massing with sloped hip roofs, natural materials, muted color scheme and details, such as deep eaves, prominent fireplace, and horizontal lines – were chosen to respect the single-family homes that comprise the Vista Del Mar Carlos Historic District. The design theme of Building 2 would provide a compatible interface between the new building and the adjacent historical neighborhood.

Building 2 would also be oriented toward Vista Del Mar Avenue in keeping with the residential character of the Historic neighborhood, and would retain a 15-foot setback along Vista Del Mar Avenue, consistent with the front yards of the residential properties along this street. Building 2 would have a maximum elevation of approximately 34 feet as viewed from Yucca Street. Due to the sloping topography along Vista Del Mar Avenue, the maximum elevation of Building 2 at the southern Project Site boundary would be approximately 47 feet to the top of the roof, as a portion of the P1 parking level would be visible from Vista Del Mar at this location. As such, Building 2 would create a height transition between the Historic District and the 20-story Building 1, and a buffer between the taller Building 1 and the one- and two-story Historic District residences. The single driveway to the parking structure from Vista Del Mar Avenue, located at the south edge of Building 2, would create a consistent appearance with existing driveways along Vista Del Mar Avenue, which provide access directly from the primary street (no alleys). Dense landscaping would be provided between Building 2 and the residential uses to the south. The three palm trees currently located within the existing front yard setbacks would be replaced by three street trees. The implementation of these features would reduce the contrast between the Project and the Historic District and, thus, reduce the Project's aesthetic effects on this historic resource to a less than significant level.

As discussed under Threshold “a”, above, the Project would not block views of the historic Capitol Records Building, which is located due west of the Project Site. As further discussed in the *Historical Resources Assessment Report* (see Appendix D of this EIR), the Project would not adversely affect the design, materials, workmanship, feeling, setting, and association of the Capitol Records Building or the area's other historic resources, including the Vista Del Mar/Carlos Historic District, the Pantages Theatre, the Little Country Church of Hollywood, the Pacific Security Bank Building, and the Hollywood Commercial and Entertainment District. In some cases, such as the Little Country Church of Hollywood, the historic structure no longer exists, or as with the Pantages Theatre, the Pacific Security Bank Building, and the Hollywood Commercial and Entertainment District, the Project is not within the same field of view as these resources or the historical character of these resources has already been affected by the mix of modern development near and adjacent to these sites.

**Because the Project would not adversely affect the aesthetic character, including design, materials, workmanship, feeling, setting, and association of the area's historic resources, it would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, or historic buildings in a state**



designated scenic highway. Moreover, the design of Building 2 would eliminate any potential for Project indirect aesthetic impacts on the Vista Del Mar-Carlos Historic District. Furthermore, with the exception of the Project's aesthetic impacts on historical resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.

An analysis of the Project's potential direct and indirect physical impacts on historical resources is presented in Section IV.C of the Draft EIR.

***Threshold (c): In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings (public views are those that are experienced from publically vantage point); or if the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?***

#### (1) Consistency Regulations that Govern with Scenic Quality

The Project is located within an urbanized area and, as such, the concern of this threshold is whether the Project would be consistent with regulations that govern scenic quality. These include LAMC lighting and signage regulations, regulations pertinent to the Hollywood Signage SUD, applicable policies of the Hollywood Plan, and regulations that govern building mass. The Project is evaluated in relation to the City's lighting regulations and the Hollywood Signage SUD 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.

The Project must comply with the LAMC lighting regulations that govern the orientation and intensity of outdoor lighting, such as illuminated signage (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 (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 Hollywood Signage SUD, 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 poorly placed, badly designed signs. The Hollywood Signage SUD applies to commercial zones within the Hollywood Community and is applicable to the Project Site's West Parcel, which is currently zoned for commercial uses. Permits for signs within the Hollywood Signage SUD are only provided after review of the sign, and sign-off, by the Department of City Planning.

Further, the Project would not conflict with Objective 7 of the Hollywood Community Plan. Objective 7, 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,”<sup>17</sup> is the only policy of the General Plan pertinent to scenic quality. In regard to the requirements of Objective 7, the Project is being built on a fully developed urban infill site, and would, therefore, not result in any loss of open space. As illustrated in Figure IV.A-12, on Mulholland Drive (see Threshold a), above), 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 views or vistas of the urban setting and Los Angeles Basin from open space along Mulholland Drive. In addition, as illustrated in simulated views from Hollywood Boulevard (Figure IV.A-8) and Gower Street (Figure IV.A-10), the Project would not block existing views of the Hollywood Hills or Hollywood Sign through northbound street corridors. As discussed under Threshold a), above, the Project would be visible from open space, such as the Mulholland scenic 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 City’s open space. The Project would not adversely impact views or 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, because the Project would be required to comply with existing lighting regulations, the policies of the Hollywood Signage SUD, including review of all signage plans; and would not conflict with the Community Plan’s Objective 7 to preserve Hollywood’s open space resources, impacts with respect to consistency with regulations that govern scenic quality would be less than significant.**

## (2) Visual Character and Quality

The potential for a project to degrade the surrounding community under Threshold (c) is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

### (a) Construction Impacts

Construction activities would entail the demolition of the existing on-site buildings, surface parking lot, and sidewalks, clearance of existing vegetation, hauling of debris, and grading of the development site. and would temporarily degrade the existing visual character of the Project Site. Excavation would be required for the partially subterranean parking podium and building foundations. Cranes would be required for the construction of the Project’s multi-story components and would be visually prominent during the construction phase. Restrictions would be placed on the use of the Vista Del Mar Avenue for truck

<sup>17</sup> City of Los Angeles Department of City Planning, Hollywood Community Plan (December 13, 1988), page HO-1. Available at: <https://planning.lacity.org/complan/pdf/HwdCpTxt.pdf>. Accessed March 15, 2019.

access and equipment staging to ensure that the focus of activity would occur along Yucca Street between Argyle Avenue and Vista Del Mar Avenue. However, construction Activities would also involve construction of new sidewalks, curbs, and utility lines in the street right-of-way, and planting of street trees along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. Under PDF- AES-1, any remaining utility poles would be removed and new lines for sewer, power, gas, and telecommunication systems would be located underground. Under PDF-AES-2, all construction fencing will be maintained in a visually attractive manner.

Construction activities, although temporary in nature, create an unfinished appearance on the Project Site which would contrast with the developed visual character of the immediate neighborhood.

An eight-foot-high construction fence to screen views of ground-level construction activities would be provided on the Project Site's perimeter. Maintenance of the construction fence and the perimeter of the construction site would comply with building code requirements to remove debris, rubbish, garbage, trash, overgrown vegetation or other similar material, and graffiti. The construction phase would begin as early as 2019, occurring for approximately two years, resulting in aesthetic impacts from construction that are of limited duration. Nevertheless, although screened at the pedestrian level, construction activities would create an unfinished appearance at the Project Site as viewed from adjacent streets and surrounding land uses. Nevertheless, because of screening that would block the site from view from the street during construction and the short-term, temporary nature of construction activities, construction of the Project would not substantially degrade the visual character of the adjacent and surrounding neighborhood. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.

*(b) Operation Impacts*

*(i) Architectural Design, Massing and Setbacks*

The Project would replace an aging three-building multi-family complex and surface parking lot, one duplex with a detached garage and studio apartment over garage, and a single-family residence with an architecturally-notable, mixed-use, high-rise building and uniquely designed multi-family residential building. Building 1 at the southeast corner of Yucca and Argyle would occupy the majority of the Project Site. The building's podium structure consists of four levels at the west edge of the building and three levels at the east edge of the building, due to the grade difference, with Yucca Street rising toward the east. Level 1 of the podium facing Yucca Street would be occupied by a restaurant and a retail use along Yucca Street, and commercial space for a restaurant or retail use at the corner of Yucca Street and Argyle Avenue. Building 1's commercial frontage would be centered on a broad, approximately 60-foot-wide main entrance to the main lobby and lounge. The front building wall at the restaurant and retail use would be set back from the sidewalk to allow for outdoor seating and other potential amenities along the street



frontage. The corner of Yucca Street and Argyle Avenue would also feature a “cut” to allow for outdoor corner space.

Figure II-5, *Ground Level Plan*, in the Project Description of this EIR depicts the Project’s building features at ground level.

(ii) *Landscape Plan and Open Space*

Figure II-13, *Landscape Plan - Ground Level Plan*, in Chapter II of this EIR, illustrates the proposed landscaping at the ground level.

The 4th floor of Building 1 would be substantially landscaped, as shown in Figure II-14, *Landscape Plan – 4th Level*, in Chapter II of this EIR. The Project would comply with all applicable City design standards related to landscaping and LAMC Section 12.21.G with respect to the provision of open space, provided in balconies, outdoor land and hardscaped amenity spaces, and interior recreational areas.

(iii) *Changes in Aesthetic Character – Project Site and Surrounding Area*

The depictions of the Project under existing and simulated future conditions further illustrate the visual character of the Project in relation to the existing setting. Figure IV.A-2, *View Location 1: Existing and Future West-Facing Views from Yucca Street - Just West of Vista Del Mar Avenue*, represent the appearance of the Project Site in the context of its existing setting and as it would appear after completion of Project construction. As shown in Figure IV.A-2, under future conditions, Buildings 1 and 2 would be visually prominent. Building 2 would be highly visible in the foreground of the Project and the 20-story Building 1 tower would form the background. As shown in Figure IV.A-2, under existing conditions, Related Projects No. 5, the 18-story Argyle House mixed-use, and Related Project No. 16, the 16-story Kimpton Everly Hotel are shown and currently affect the character of background views to the north and west of the Project Site. Although the Project’s modern tower and Building 2 would be larger in scale with respect to the residential neighborhood in the foreground along Vista Del Mar Avenue, many of the buildings in the surrounding area are also high-rise or multi-story in character. Figure IV.A-2 also shows the transition provided by Building 1 between the apartment buildings immediately to the north at Yucca Street at Vista Del Mar Avenue and the single-family residential neighborhood to the south.

With Building 2 as a buffer between the neighborhood and Building 1, as viewed from Location 1, the Project would not substantially alter or degrade the existing visual character of the Project area by damaging valued scenic features or resources, or introducing elements that substantially detract from the visual character of the site and its surroundings.

Figure IV.A-3, *View Location 2: Existing and Future Views from Westbound Hollywood Freeway*, shows the Project Site under existing and simulated future conditions as seen

from the westbound Hollywood Freeway at the approximate location of Vista Del Mar Avenue. As shown in Figure IV.A-3, the 16-story Kimpton Everly Hotel and Argyle House mixed-use dominate the western portion of the skyline, particularly because of the proximity of the Kimpton Everly Hotel to the freeway. Portions of buildings and signage in the Hollywood community, including the top of the Pantages Theatre and tall signage are visible in the background. No prominent or distinct views of scenic resources, such as hills, high-rise clusters, or unique or historic buildings are visible in the background. Because the architectural quality of the Project would be consistent and other, recent high-rise development in the area, and because more distant buildings in the setting do not show specific features and are, therefore, non-distinct, the Project in this context would not degrade the visual character of the Project Site and its surroundings.

Figure IV.A-4, *View Location 3: Existing and Future East-Facing Views from Argyle Avenue at Yucca Street*, shows existing and simulated future conditions of the Project Site as seen from the intersection of Argyle and Yucca Street, to the west of the Project Site. In the existing setting, a section of the Kimpton Everly Hotel is located in the left of the photo and the Argyle House mixed-use project is located in the right of the photo. The existing Project Site is shown as occupied by two-story apartment units in the center of the view. No visual resources or aesthetically distinctive features are visible in Figure IV.A-4, the value of which would be degraded by the Project. As shown in Figure IV.A-4, the Project's tower component would be set back from the intersection, similar to the Kimpton Everly Hotel in the left of the simulation, and street trees would be added along Argyle Avenue and Yucca Street. As viewed from View Location 3, the Project would not substantially alter or degrade the existing visual character of the Project Site and its surroundings area by damaging valued scenic features or resources, or introducing elements that substantially detract from the visual character of the area.

Figure IV.A-5, *View Location 4: Existing and Future East-Facing Views from Yucca Street at Vine Street*, illustrates the existing and simulated future conditions of the Project Site as seen from a location one block to the west of Argyle Avenue. Existing commercial uses line both sides of the street and the Argyle House mixed-use project is visible in the right center of the view. Marginally visible in the photograph is the Capitol Records Building in the far right of the photo. As shown in the simulated view, the north façade of the Project would be visible beyond the Argyle House building. Given the distance of the viewer from the Project Site, the Project's 20-story tower would not appear substantially taller than the foreground high-rise. As seen from Location 4, the Project would not substantially alter or degrade the existing urban setting or damage valued scenic features or resources, or introduce elements that would substantially degrade the visual character of the Project Site and its surroundings.

Figure IV.A-6, *View Location 5: Existing and Future Views from the Eastbound Hollywood Freeway*, shows existing and simulated future conditions of the Project Site as seen from the eastbound Hollywood Freeway in the location of Vine Street. As shown under existing conditions, the view field is urban with several high-rise buildings, including the Kimpton Everly Hotel in the left of the photo, the Argyle House in the center of the photograph, the

Capitol Records Building in the far right of the photo, and the W Hotel in the background. A windowless storage facility is located in the foreground along the freeway. Although several stories of the Capitol Records Building, a designated cultural and historical monument, are visible from this location, the view location does not feature distinctive broad views of visual resources, such as unique high-rise clusters, hillsides, or broad expanses of urban landscape. In the simulated view, the Project would be background to the Kimpton Everly Hotel and directly behind the storage facility. As shown in the simulation, the Project would fit in with the urban setting and would not substantially degrade the visual character of the Project Site and its surroundings.

Figure IV.A-7, *View Location 6: Existing and Future South-Facing Views from Argyle Avenue North of the Hollywood Freeway*, shows existing and simulated future conditions of the Project Site as seen from Argyle Avenue, approximately 0.21-miles north of the Project Site. As shown in Figure IV.A-7, the surrounding area is an urban residential neighbor with multi-story residential buildings on both sides of Argyle Avenue. Taller high-rises, such as the Kimpton Everly Hotel and the under-construction Argyle House are located to the south of the elevated Hollywood Freeway. The background formed by the taller buildings is not visually inconsistent with the character of the area. As shown in the simulation, the Project's high-rise component would be partially visible behind and slightly higher than the 16-story Kimpton Everly Hotel. The Project would not be inconsistent with or detract from the urban character of the setting. As shown in Figure IV.A-7, the Project would not substantially degrade the visual character of the Project Site and its surroundings.

Figure IV.A-8, *View Location 7: Existing and Future South-Facing Views from Vista Del Mar Avenue at Yucca Street*, provides existing and simulated future conditions of the Project as seen from Vista Del Mar Avenue, immediately to the northwest of the Project Site. As shown in Figure IV.A-8, Building 2 would provide a transitional structure between the Building 1 tower and the single-family residences to the south and east of the Project Site. Building 2 would be street-oriented, with direct access into the building from the Vista Del Mar sidewalk. Building 2 would maintain a 15-foot setback from Vista Del Mar and, as shown in the simulation, street trees would be added along the sidewalk. Figure IV.A-8, further illustrates that the existing surface parking lot at the intersection would be removed and replaced by Building 2 and overhead power lines would be moved underground which would improve the visual character of the Yucca Street/Vista Del Mar Avenue intersection. As seen from View Location 7, the Project would create transition in scale and character with the adjacent neighborhood and, as such, would not substantially degrade the visual character of the Project Site and its surroundings.

Figure IV.A-9, *View Location 8: Existing and Future North-Facing Views from Argyle Avenue at Hollywood Boulevard*, shows existing and simulated future conditions of the Project Site as seen from the Hollywood Boulevard, approximately 0.12-miles to the south of the Project Site. The street corridor provides views of the Hollywood Hills in the background. New buildings and signage in the foreground and along the Argyle Avenue corridor establish the commercial and mixed-use character of the area. The Argyle House

are prominent in the center background. The area is a distinct commercial corridor with pronounced advertisements and retail, hotel, and daytime and nighttime entertainment activity. The simulation shows the Project tower rising to the right of the street corridor. It would be consistent with the urban setting and would not substantially degrade the visual character of the Project Site and its surroundings.

Figure IV.A-10, *View Location 9: Existing and Future North-Facing Views from Gower Street at Hollywood Boulevard*, provides existing and simulated future conditions of the Project as viewed from Gower Street, approximately 0.17-mile to the southeast of the Project Site. As shown in Figure IV.A-10, the area has a low rise, mixed-use character, with a visible landscaped center parkway in Gower Street and the Hollywood Presbyterian Church visible at the east side of Gower Street. Several palm trees form the skyline view and the street corridor is generally clear of overhead power lines. The area contains several surface parking lots, and the 16-story Kimpton Everly Hotel is visible in the left background. In the simulation, the Project would appear in the foreground of the Kimpton Everly Hotel. As shown in Figure IV.A-10, the Project would substantially contribute to Hollywood's higher level of urbanization, but would not substantially degrade the visual character of the Project Site and its surroundings.

Figure IV.A-11, *View Location 10: Existing and Future North-Facing Views from Vista Del Mar Avenue at Carlos Avenue*, provides existing and simulated future conditions of the Project as seen from Vista Del Mar Avenue, approximately 190 feet to the southeast of the Project Site. From this perspective, the 20-story tower would sit beyond with the Vista Del Mar residential land uses. To enhance the visual compatibility of the Project with the existing Vista Del Mar residential uses, the conceptual design of Building 2 is a contemporary adaption of the traditional Craftsman style.

Building 2 would also be oriented toward Vista Del Mar Avenue. Because all existing residences along Vista Del Mar Avenue are facing Vista Del Mar Avenue, this orientation would be in keeping with the residential character of the Historic neighborhood in which all front yards face this street. The Project would also retain a 15-foot setback along Vista Del Mar Avenue, consistent with the front yards of the residential properties along this street. Building 2 would be three stories and have a maximum elevation of approximately 34 feet as viewed from Yucca Street. Due to the sloping topography along Vista Del Mar Avenue, the maximum elevation of Building 2 at the southern Project Site boundary would be approximately 47 feet to the top of the roof, as a portion of the P1 parking level would be visible from Vista Del Mar at this location. Building 2 would also create a buffer between the taller Building 1 and the one- and two-story Historic District residences. Building 1's landscaping along the 4<sup>th</sup> Level (top of the podium), as illustrated in Figure II-14, *Landscape Plan – 4<sup>th</sup> Level*, in Chapter II of this EIR would serve to soften the transition of the lower height uses along Vista Del Mar to Building 1. A single driveway to the parking structure from Vista Del Mar Avenue located at the south edge of Building 2 would create a consistent appearance with the existing driveways along Vista Del Mar Avenue, which access residences from the street. Dense landscaping would be provided between Building 2 and the residential uses to the south. Three palm trees currently

located within front yard setbacks would be replaced by three street trees. Due to implementation of appropriate transitions of visual elements, height and scale, the Project would not have a significant impact on the visual character of the Historic District – the eligibility of which would be maintained and not impacted by any visual elements of the Project, as set forth in detail in Section 4.C.2, Historical Resources, of this Draft EIR.

The heavily foliated Little County Church property, formerly identified as a City of Los Angeles Cultural monument, is located between Carlos Avenue and the Project Site. Although the church was destroyed by fire, the site still contains a range of trees and shrubs visible from Carlos Avenue and retains an open space character. Because Building 1 would be located within the background of the Little Country Church property, it would not physically encroach into the open space and greenery of the church site or block views of the property. However, in the view from Carlos Avenue at Vista Del Mar Avenue, the Project would change the scale of the background setting and introduce elements that would contrast with the visual character of the open space. However, because of visible landscape elements on the fourth story of Building 1, plantings at the south edge of the building, and the modern, high quality aspect of the Project, the Project would not substantially degrade the visual character of the Little Country Church property.

Figure IV.A-12, *View Location 11: Existing and Future East-Facing Views from the Hollywood Bowl Overlook*, approximately 1.35 miles to the northwest of the Project Site, provides panoramic views of clusters of urban development in Hollywood to the west of the Hollywood Freeway (also visible) and the cluster of high-rise development in downtown Los Angeles on the skyline. The Capitol Records Building is visible in the foreground of Hollywood community multi-story buildings. As depicted in Figure IV.A-19, the Project would be discernable, but would serve as a minor component of the evolving Hollywood skyline that would contribute to the overall scenic vista and the visual character of the broader area. As shown from this overlook, the Project would not substantially degrade the existing panoramic character of the views of the cityscape and skyline.

#### (iv) *Visual Character Conclusion*

The Project would provide high-quality architecture, a distinctive tower component, and a vibrant commercial street front that would enhance the visual character and walkability of Yucca Street. The Project would eliminate the existing overhead utility lines and the existing surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue. Building 2 would have a maximum height of 47 feet to the roof top, and provide a transition between the scale of the 20-story Building 1 and the one- and two-story Vista Del Mar/Carlos Avenue residential neighborhood. In addition, the contemporary adaption of the traditional Craftsman style in Building 2 would serve as a compatible design transition with the architectural character of the Vista Del Mar/Carlos residential neighborhood. The implementation of the Project's features and design would reduce the contrast between the Project Site and the residential neighborhood providing appropriate transitions that would minimize the appearance and height difference between the new tower and the adjacent residential neighborhood. **The Project would provide new architecture and**

other visual features that would be consistent with the visual character of the surrounding area. The analysis herein is provided for informational purposes only and the aesthetics impacts of the Project related to shade and shadow are not significant pursuant to SB 743 and ZI No. 2452.

***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) Construction

Existing lighting on Yucca Street is minimal, consisting of street lights at the intersections of Argyle Avenue and Yucca Street and Vista Del Mar and Yucca Street. Single wall-mounted door lights are also located at two of the existing apartment complex's gated entrances. Existing lighting along Vista Del Mar Avenue is consistent with low-level lighting associated with a low-density residential neighborhood (street lights, front door lights, and low-level spillage from windows). Argyle Avenue provides a higher level of night lighting, street lights to the south of the Project Site and parking lot lights along the west side of Argyle Avenue, illuminated traffic signals within the intersection of Argyle Avenue and Yucca Street, and higher night traffic volumes. The single-family neighborhood to the east of the Project Site along Vista Del Mar Avenue is considered a light-sensitive land use. Although single-family neighborhoods are generally darker than mixed-use areas and, thus, more light sensitive, the area's multi-family uses, such as the multi-family residential building directly to the north of the Project Site, the 18-story Argyle House mixed-use directly to the west of the Project Site, the 16-story Kimpton Everly Hotel to the north, and the 7-story Eastown Project south of the Project Site would also be sensitive to light and glare.

It is expected that construction activities would occur primarily during daylight hours and that construction-related illumination in the nighttime would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Per LAMC Section 93.0117(b), no exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows, glass doors, balconies, or any ground surface intended for recreation on a residential property. Construction lighting also would last only as long as needed during the finite construction process. Thus, with compliance with existing LAMC regulations, including shielding of light sources and restrictions on light levels at adjacent residential properties, artificial light associated with construction activities would not adversely affect residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity.

Construction activities would not require the use of large, flat, and shiny surfaces that would reflect sunlight or cause other natural glare. **As such, construction activities would not cause light or glare which would adversely affect day or nighttime views in the area. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.**

## (2) Operation

### (a) *Artificial Light*

The Project's exterior lighting would consist of new pedestrian lights and security and wayfinding lighting provided at vehicle and pedestrian entry points and areas of circulation, including lighting at the lobby entrance and along the public sidewalks to ensure visibility and pedestrian security. Accent lighting is proposed to complement building architecture and landscaping.

Because parking would be located within the interior and subterranean parking levels, pole-mounted light fixtures (such as parking lot lights) are not anticipated. All lights in public areas would comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting.

As such, the Project would introduce new point source lighting, including architectural lighting, security and way-finding lights, landscape lighting, and visible light emanating from the windows of the Project's residential interiors and private rooftop terraces. Architectural surface lighting may be used to highlight the building's unique architectural elements. New point source lights, including rooftop terrace lights, architectural and landscape lighting, and security lighting would be shielded and/or focused on the Project Site and would be more ambient in character as viewed from the surrounding area. As provided in PDF-AES-3, decorative lighting and building security lighting along public streets and within the podium courtyard and pool deck and 20<sup>th</sup> floor pool deck will be placed and directed, and be of a fixture type, to prevent direct visibility of the light source from the single-family residences on Vista Del Mar Avenue, the Kimpton Everly Hotel, and the nearby multi-family residences (Argyle House, the residential building directly north of the Project Site, and the Eastown Project to the south). In addition, LAMC Section 93.0117(b) requires that no exterior light 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.

Interior lights from the Project's hotel rooms and residential units would also be visible from the nearby light sensitive uses. This type of ambient lighting, however, would blend with the existing illuminated character of other mid-rise and high-rise multi-family uses in the Project proximity, such as the Argyle House directly to the west of the Project Site as well as the Kimpton Everly Hotel to the north.

New signage would be used for building identification, hotel and commercial/restaurant tenant advertising/branding, wayfinding, and security markings. It would be designed and located to be compatible with the architecture and landscaping of the Project. Hotel, restaurant, and retail signage would be similar to other signs along Yucca Street, Argyle Avenue, and Vine Street. Signage on the West and Center Parcels would be consistent

with the provisions of the Hollywood Signage SUD, in that it would serve only on-site uses, be coordinated with the Project's architectural design, appropriately scaled to the buildings on the lot, and result in a visually uncluttered appearance. Although the Center Parcel is not located within the Hollywood Signage SUD, PDF-AES-4 would ensure that signage on the west and center parcels would also meet the standards established in the Hollywood Signage SUD. No off-site signage is proposed. Illuminated signs would also comply with LAMC requirements, including LAMC Section 14.4.4, 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. With the implementation of PDF-AES-3 and compliance with regulatory requirements, the increase in ambient and direct lighting is not expected to interfere with activities in nearby residences. No signs would be permitted in the East Parcel, which would continue to serve as a residential use in a residential zone.

**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 would not create a new source of light that would adversely affect day or nighttime views in the area. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project related to lighting shall not be considered significant pursuant to SB 743 and ZI No. 2452.**

*(b) 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 Hollywood Freeway), PDF-AES-5 incorporates into the Project the use of rated, low-reflectivity building materials. With the incorporation of PDF-AES-4, final glazing choices and trim materials would be evaluated for glare prior to the issuance of a building permit. **Project design features would ensure that potential glare from the building façade would not create a new source of glare that would adversely affect day or nighttime views in the area or interfere with the performance of off-site activities. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project related to glare are not significant pursuant to SB 743 and ZI No. 2452.**



## e) Cumulative Impacts

Chapter III, *General Description of Environmental Setting*, of this Draft EIR provides the list of the 137 related projects that the City has identified for the Project. Related projects include “past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside of the control of the agency.”<sup>18</sup> The related projects are mapped in Chapter 3, Figure 3-1, *Related Projects Map*. The related project list primarily reflects infill development within the larger, built-out Hollywood area. 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 than the Project when viewed at the pedestrian level within the flatter, urban areas of Hollywood. From more distant locations at higher elevations, the related projects and Project would contribute cumulatively to changes in the downtown Hollywood skyline, as represented in Figure IV.A-12, *View from the Hollywood Bowl Overlook*, discussed above. Figure IV.A-12 represents the trend in the community to concentrate development within high density housing developments and taller residential and commercial buildings. The potential for the related projects to create cumulative aesthetic effects with the Project is generally proportional to their distance from the Project Site, since that determines their potential to share the same view field. The nearest related projects are the following:

- Related Project No. 16 (Kimpton Everly Hotel): 16-story hotel at 6230 Yucca Street, 60 feet from the Project Site
- Related Project No. 5 (Argyle House Project): 18-story mixed-use project at 6230 Yucca Street, 100 feet from the Project Site
- Related Project No. 29 (Hollywood Center): Mixed-use project located at 1740 Vine Street, 400 feet from the Project Site
- Related Project No. 14 (Pantages Theatre Offices): The 10-story Pantages Theatre Office Project at 6225 Hollywood Boulevard, 500 feet from the Project Site
- Related Project No. 2 (El Centro): The El Centro Mixed-Use at 6200 Hollywood Boulevard, 600 feet from the Project Site

All other related projects within approximately one-half mile of the Project Site, or related projects containing high-rise buildings within a one-mile radius, have the potential to generate cumulative aesthetic impacts since they may share a line of sight with the Project. These related projects, listed by distance from the Project Site, are the following:

- Related Project No. 12 (Hollywood Gower Mixed Use): 258-foot-high building at 6100 Hollywood Boulevard, 0.26 miles from the Project Site
- Related Project No. 124: (Moderna Argyle): 276 apartment units at 1546 Argyle Avenue, 0.29 miles from the Project Site (stories unknown)
- Related Project No. 15: 130-foot-high building at 1601 Vine Street, 0.29 miles from the Project Site

<sup>18</sup> CEQA Guidelines Section 15130(b)(1)(A).

- Related Project No. 69 (CitizenM Hotel): 14-story-high building at 1718 Vine Street, 0.31 miles from the Project Site
- Related Project No. 45 (Palladium Residences): Two 28-story buildings at 6201 Sunset Boulevard, 0.40 miles from the Project Site
- Related Project No. 36 (Columbia Square Mixed Use): 20-story building at 6121 Sunset Boulevard, 0.41 miles from the Project Site
- Related Project No. 49: 90-foot-high building at 6250 Sunset Boulevard, 0.41 miles from the Project Site
- Related Project No. 71 (Sunset & Vine Mixed Use): 5-story building at 1538 Vine Street, 0.42 miles from the Project Site
- Related Project No. 19 (Conversion of Security Pacific Building): 80-room hotel at 6381 Hollywood Boulevard, 0.44 miles from the Project Site
- Related Project No. 76 (Residential Development): 42 residential units at 6001 Carlton Way, 0.45 miles from the Project Site
- Related Project No. 128: 27 residential units and 198-room hotel at 6140 Hollywood Boulevard, 0.5 miles from the Project Site (flanking La Fonda Theater)
- Related Project No. 10 (Selma Hotel): 125-foot-high building at 6417 Selma Avenue, 0.58 miles from the Project Site
- Related Project No. 62: Ivar Gardens Hotel at 6409 Sunset Boulevard, 0.60 miles from the Project Site
- Related Project No. 66 (Hyatt House): 95-foot-high building at 6611 Hollywood Boulevard, 0.63 miles from the Project Site
- Related Project No. 61 (Academy Square): 23-story building at 1341 Vine Street, 0.67 miles from the Project Site
- Related Project No. 43 (Sunset + Wilcox): Located at 1541 Wilcox Avenue approximately 0.67 miles to the southwest of the Project Site, this related Project consists of 225 hotel rooms and 13,004 square feet of restaurant uses in a 162-foot-high building
- Related Project No. 96: (Selma Hotel) Located at 6516 Selma Avenue approximately 0.75 miles to the southeast of the Project Site, this related Project consists of 212 hotel rooms and 13,456 square feet of restaurant uses in a 10-story building
- Related Project No. 33: Located at 1824 Highland Avenue approximately 0.76 miles to the west of the Project Site, this related Project consists of 118 apartment units in a 120-foot-high building
- Related Project No. 4 (Sunset Bronson Studios): Located at 5800 Sunset Boulevard approximately 0.85 miles to the east-southeast of the Project Site, this related Project consists of 404,799 square feet of offices in an approximately 200-foot-high building
- Related Project No. 37 (High Line West): Located at 5550 Hollywood Boulevard approximately 0.90 miles to the east southeast of the Project Site, this related Project

consists of 278 apartment units and 12,500-square feet of retail uses in an 86-foot-high building

- Related Project No. 64 (Mixed Use): Located at 1310 Cole Avenue approximately 0.90 miles to the southwest of the Project Site, this related Project consists of 375 apartment units and 2,800 square feet of office uses in a 110-foot-high building
- Related Project No. 86 (Hollywood Crossroads): Located at 6701 Sunset Boulevard, approximately one mile to the west-southwest of the Project Site, this related Project consists of a seven building complex of hotel, retail, residential, and office uses. Three of the six buildings comprise 30-story, 31-story, and 32-story towers, respectively.

### (1) Scenic Vistas

As viewed from the Hollywood Hills, from generally elevated areas to the north of the freeway, or from other regional neighborhood streets, the related projects and the Project would contribute to the same viewshed and skyline profile (see Figure IV.A-12, discussed above). The Project in combination with related projects and existing high-rises would create a visually attractive panoramic vista.

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 that are aesthetic resources. Although the Project occurs within the same line-of-sight as the 18-story Argyle House mixed-use (Related Project No. 5) and would block focal views of the Capitol Records Building, which is considered a scenic resource, from the intersection of Yucca Street and Vista Del Mar (and along Yucca Street to the east of Argyle Avenue), As shown in Figure IV.A-2, *Existing and Future West-Facing Views of the Project Site from Yucca Street*, above, the view from this view location does not currently experience an unobstructed view of the Capitol Records Building, which is blocked by the 18-story Argyle House development (Related Project No. 9), and the topography, which drops to the west. Because of the topography, the view of the Capitol Records Building from Yucca Street (east of Argyle Avenue) is a secondary view, with primary focal views occurring from Argyle Avenue (to the south of Yucca Street) and from Yucca Street to the west of Argyle Avenue. As such, Related Project No. 5 and the Project would not cumulatively block primary views of the Capitol Records Building. Related Project No. 29 would construct high-rise buildings in the same block as the Capitol Records Building. However, the buildings would be located to the south of the Capitol Records Building and located in deep setbacks with a paseo between Vine Street and Argyle Avenue, so that views of this scenic resource would be available through paseos from Argyle Avenue and from Vine Street to the north and south of the Capitol Records Building. This configuration would also preserve the broad views of the Capitol Records building from the eastbound Hollywood Freeway, and from other locales throughout the broader community.

As shown in Figures IV.A-9 and IV.A-10, the Project and the related projects would not block views of the Hollywood Hills and the Hollywood Sign through existing street corridors. The future view toward the Project Site along the Argyle Avenue street corridor (Figure IV.A-9) includes both Related Project No. 16 (Kimpton Everly Hotel) and Related

Project No. 5 (Argyle House). As shown in the Figure IV.A-9, neither the Project nor the Project in combination with these two related projects would block the view of the hillside through the street corridor compared to existing conditions. Because of the distance of the Project from the Gower Street corridor (Figure IV.A-10), implementation of the Project would not block any views through that street corridor and would not cumulatively contribute to any blockage of views of the Hollywood Hills or the Hollywood Sign in the corridor background. As demonstrated in these figures, except through street corridors, with the exception of near views, existing long-range views within the Hollywood community are generally blocked by existing, low-rise development due to the relatively flat terrain of the area.

Related Project No. 79, 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 skyline would be available to park visitors. The west terminus of the proposed 38-acre Hollywood Central Park Project is located approximately 0.5 miles to the east of the Project Site. 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 Hollywood Freeway. The park would incorporate a plaza with a signature restaurant, café, inn, and terrace that would be constructed on a planted and landscaped “green bridge” over Hollywood Boulevard. The deck surface would rise approximately 25 feet above the street grade.

The proposed buildings would add additional height over the deck surface. The raised component (apex) of the park at the Hollywood Boulevard overcrossing would also have broad scenic vistas of the urban skyline and hills. The Hollywood Central Park, in conjunction with the Project and other related projects would upgrade the quality of development and overall aesthetic and urban character of the Hollywood community.

In the proximity of the Project Site, westbound drivers on the freeway would emerge from the overhead park at a point to the east of Gower Street. At this point, panoramic views of the Hollywood skyline and the Hollywood Hills would be available, and would not be blocked by the Project in combination with other related projects.

In summary, the Project in combination with the related projects would not block notable focal views or panoramic scenic vistas of the Hollywood Hills, or Downtown Los Angeles skyline and would constitute a visually appealing addition to the Hollywood skyline. The Project in combination with the related projects would add to the Hollywood downtown skyline as seen from hillside locations. The downtown Hollywood area already presents a variety of building massing and articulation, as well as design, and this variety would be enhanced with the Project and related projects (please see Figure IV.A-12). While the nature of the views for hillside residents would be altered by the growing skyline, long range views of the Hollywood skyline, Downtown Los Angeles skyline, and the Los Angeles Basin from Mulholland Drive would remain available. **As such, there would not be a cumulative impact on scenic vistas. Moreover, although some related projects**

**could cause some view blockage from public streets, particularly across existing vacant properties or parking lots, because the Project would not block views of scenic resources from existing vantage points and, as such, would not cause any view blockages of any scenic vistas, it would not make a cumulatively considerable contribution to adverse view impacts. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.**

## (2) 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. However, some open space areas, such as the Hollywood Hills are also visible from the area. The Project would not block any views of the Hollywood Hills or the Hollywood sign and, as such, would not contribute to cumulative aesthetic effects on these scenic resources. The Project Site is located adjacent to the Vista Del Mar/Carlos Historic District, a contributing historic resource in the area. As discussed in Section V.B.3 of the *Historical Resources Assessment Report* (included as Appendix D of this EIR), the Project would not adversely affect the character historical resources in the area with respect to views, materials, design, workmanship, feeling, and setting. Of the 19 related projects in the Project vicinity, only three are located in the immediate vicinity of the Project Site. The 18-story Argyle House (Related Project No. 5) is located across the street from the Project Site between Argyle Avenue and Vine Street and under existing conditions, blocks secondary views of the Capitol Records Tower Building at the intersection of Yucca and Argyle. The Argyle House is characterized as a modern white tower, with strongly defined, undulating horizontal projections, some occupied by balconies, at each story. The building color and the undulating balconies reflects and complements the curved architectural design and iconic awnings of the Capitol Records Building and, thus, does not diminish the aesthetic character of the latter.

Related Project No. 29 would construct high-rise buildings in the same block as the Capitol Records Building. The architectural design is also intended to complement the modernist design of the Capitol Records Building. In addition, these buildings would be located in deep setbacks with a paseo between Vine Street and Argyle Avenue, so that new development would not encroach upon or block views of this scenic resource from Argyle Avenue and Vine Street to the north and south of the Capitol Records Building. The Project Site and many related projects are located near the Hollywood Historic Commercial and Entertainment District, which runs along an approximate 12-block section of Hollywood Boulevard. Related projects in this area include Related Project No. 14, the 10-story Pantages Theatre Office project and Related Project No. 19, the conversion of 1921 Security Pacific Bank building. In these cases, the original architectural design would be retained. The Security Pacific Bank Building would continue to retain its original façade and the 10-story office tower addition to the Pantages Theatre would be constructed over the original building. The office tower would be consistent with the original 1929 Art Deco tower design for the Pantages. In both cases, neither of these

related projects would remove the features that give the original buildings their aesthetic 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. 2, El Centro and Related Project No. 128, a hotel adjacent to the historic La Fonda Theater, would be constructed in existing surface parking lots and would not directly affect the historic buildings, rooftop signs and other features that contribute to the Hollywood Historic Commercial and Entertainment District's scenic character.

As further discussed in the *Historical Resources Assessment Report* (see Appendix D of this EIR), the Project would not adversely affect the design, materials, workmanship, feeling, setting, and association of the Capitol Records Building or the area's other historic resources, including the Vista Del Mar/Carlos Historic District, the Pantages Theatre, the Little Country Church of Hollywood, the Security Pacific Bank Building, and the Hollywood Commercial and Entertainment District. None of the related projects are within a local or state scenic highway.

**Accordingly, the Project and related projects would not substantially damage the area's historic resources and, as such, would not result in a cumulatively significant impact on these scenic resources. Therefore, cumulative impacts on historic scenic resources would be less than significant. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.**

### (3) Regulations that Govern Scenic Quality

#### (a) Consistency with the Hollywood Community Plan

The Project in combination with related projects would be located within the Community's existing commercial district 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-12, 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 Community's open space areas. The Project would not block views of the Hollywood Sign or broad views of the Hollywood Hills 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 and related projects would be required to comply with the LAMC and other regulations to ensure consistency with policies of the Community Plan that govern scenic quality. In addition, as discussed in Section IV.H, *Land Use and Planning*, of this Draft EIR, the Project and related projects would be required to comply applicable regulations of the LAMC that govern scenic quality.**

(b) *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 primarily located within the Community'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-12, 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 Community's open space areas, such as parks and open street corridors. The Project would not block views of the Hollywood Sign or broad views of the Hollywood Hills 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 and related projects would be required to comply with the LAMC and other regulations to ensure there would be no conflicts with zoning or other regulations that govern scenic quality. As such, the Project would not contribute to a cumulatively significant impact.**

(c) *Visual Character and Quality*

As with the Project-level analysis above, the potential for a project to degrade the surrounding community under Threshold (c) is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

The analysis of visual character and quality addresses the impact of development on the appearance of an area and the relationship of new development to the nearby settings in which they are located. There are five related projects in the immediate Project Site vicinity that, with the Project, would contribute to the cumulative aesthetic character of the area as experienced by pedestrians and residents. Rated by distance from the Project Site, these include the following:

- **Related Project No. 5 (Argyle House Mixed-Use):** This related project consists of the 18-story Argyle House mixed-use project at 6230 Yucca Street is directly across Argyle Avenue to the west and within 100 feet of the Project Site. The Argyle House would provide 85 residential condominiums and a ground floor retail/commercial component (13,890 square feet of commercial floor area) which, in combination with the Project, would introduce more residents to the area and enliven the street front with pedestrian activity, street front retail, and improved landscaping and lighting along both Argyle Avenue and Yucca Street.

- Related Project No. 16 (Kimpton Everly Hotel): This related project consists of the 16-story Kimpton Everly Hotel at 6230 Yucca Street, which is located directly across Yucca Street to the north and within 60 feet of the Project Site. The Kimpton Everly Hotel includes a 5<sup>th</sup>-floor pool deck and will also provide street front amenities, including street trees, lighting, and new sidewalks, which in combination with the Project, would create a more pedestrian-friendly street front. The Kimpton Everly Hotel would be located between the Project and the Hollywood Freeway and would reduce the Project's lighting and view effects relative to freeway drivers.
- Related Project No. 29 (Hollywood Center): The Hollywood Center mixed-use project located at 1740 Vine Street, which is located approximately 400 feet to the west/southwest of the Project Site, is comprised of 35- and 46-story buildings flanking the Capitol Records Building to the east and west of Vine Street. The related project also includes two 11-story buildings along Ivar Avenue and Argyle Avenue, respectively. As with the Project, its retail uses at ground level, paseo, and high density residential uses would introduce more pedestrians to the area and enliven Vine Street and adjacent Yucca Street and Argyle Avenue. The towers, in combination with the Project, would contribute to a skyline profile for the Hollywood community. The Hollywood Center buildings would be visible from Argyle Avenue and the Hollywood Freeway.
- Related Project No. 14 (Pantages Theatre Offices): The Pantages Theatre Office Project at 6225 Hollywood Boulevard, which is located approximately 500 feet to the southwest of the Project Site, would consist of ten stories (214,000 square feet) of office space above the theater site (while maintaining the theater). As with other related projects in the vicinity, this related Project would be a contributory feature of the Hollywood skyline.
- Related Project No. 2 (El Centro): The El Centro Mixed-Use at 6200 Hollywood Boulevard, approximately 600 feet directly to the south of the Project Site (to the south of Carlos Street), would add 952 apartment units and ground floor commercial uses. Eastown, a 535-unit component of the El Centro Project located between Carlos Street and Hollywood Boulevard has already been completed. The incomplete component would be located to the south of Hollywood Boulevard. As with the Project, the related project would provide street improvements, including new sidewalks, street trees, improved lighting and increased pedestrian activity. As such, this Project would contribute to the pattern of greater pedestrian movement throughout the community. The building heights would range from approximately 60 feet to 85 feet and feature contemporary architecture. As lower, intermediate height buildings, this related project would blend in with existing development and add transitional heights between existing and proposed tall buildings in the area and older single and two-story buildings.
- Related Project No. 79 (Hollywood Central Park): The west terminus of the approximately 38-acre Hollywood Central Park Project is located approximately 0.5 mile to the east of the Project Site. 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 Hollywood Freeway. The park would incorporate a plaza with a signature restaurant, café, inn, and terrace



that would be constructed on a planted and landscaped “green bridge” over Hollywood Boulevard. The deck surface would rise approximately 25 feet above the street grade.

Other related projects in the vicinity of the Project Site would, in combination with the Project, contribute to cumulative changes in the visual character of the community, as experienced by local pedestrians and residents. Although all related projects would incrementally contribute to denser urbanization of the Hollywood community, related projects that are nearer to the Project Site would create more street front continuity, including sidewalk improvements, landscaping, and pedestrian activity within a common area. Other relatively close related projects that, in combination with the Project, would contribute the most to the cumulative aesthetic change are listed above according to their distance from the Project Site. Those related projects nearer to the Project Site would more strongly contribute to a cumulative change in combination with the Project, as experienced by nearby residents or pedestrians. In addition, related projects that contain high-rise components would further contribute to cumulative change of the visual character of the community from its currently low- and mid-rise appearance to a low-rise, mid-rise, and high-rise community. In addition to buildings, the raised component (apex) of the future Hollywood Central Park would provide broad scenic vistas of the urban skyline and hills. The Park in conjunction with related projects would improve the quality of development and overall aesthetic and urban character of the Hollywood community and, as such, would not cumulatively contribute to a degradation the character and quality of the surrounding area.

In addition to the above-listed projects, all 137 of the related projects in the Hollywood community, illustrated in Figure III-1, *Related Projects Map*, in Chapter III of this Draft EIR, would change the visual character of the area to a denser and greater high-rise community than under existing conditions. The concentration of growth would generate greater pedestrian activity and visual vibrancy by creating an abundance of street front retail and restaurant uses, such as sidewalk cafés, and by locating these uses, along with hotel and residential uses, proximate to the Metro Red Line and other transit, thereby improving the pedestrian experience along the street front. As shown in Figure III-1, the greatest concentration of growth is located along Hollywood Boulevard, Sunset Boulevard, Selma Avenue, and Argyle Avenue. Greater activity in these areas would contribute to a denser and more urban environment, enhanced by improved lighting, reduced surface parking lots, improved sidewalks, new street trees, and other streetscape. The design and architecture of new related projects would be subject to review and approval by the City, which can be expected to enliven the visual character of the area, compared to existing uses such as surface parking lots and strip malls. In addition, the high rise elements associated with many of the related projects would contribute to a skyline profile in the area. **As discussed above, the Project and related projects would change but improve the pedestrian environment and, as such, would not degrade, eliminate, or substantially detract from the visual character the area. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.**

(d) *Shading*

The City does not have regulatory requirements related to shade and shadow impacts of new development, and shade and shadow impacts of the Project are not considered significant impacts under CEQA.

(4) **Light and Glare**

The Hollywood community 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 urban landscape. The cumulative development occurring within the area typically includes lighting that is appropriate to the respective uses of ground level restaurants and upper story hotel and residential uses. Pursuant to City policies and regulations, new development would be required to provide signage that is consistent with the Hollywood Signage Supplemental Use District. The Hollywood Signage Supplemental Use District prohibits billboards and certain other signs. Under the Supplemental Use District, new lighting would be required to blend with the architectural character of proposed new development. To the extent that a related project may exceed normal lighting tolerances, such lighting would be an individual project effect, not contributed to by the Project. No signs would be permitted in the Project's residentially-zoned parcel (East Parcel)

Likewise, with compliance with existing Building Code regulations, such as 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 the *Citywide Design Guidelines for Multi-Family and Commercial Mixed-Use*, which require uniform, and glare-free lighting, the related projects would not produce notable glare effects on nearby sensitive uses or activities. Projects typically avoid highly reflective materials and include architectural articulation to break up large expanses of wall area. Related projects using more reflective surfacing, such as broad expanses of glass as with the Project, are expected to use modern, lower glare cladding materials. **For these reasons, there would be no adverse cumulative effects even if there were; the Project would not contribute to that effect because, as described above, the Project's lighting would be generally subdued and consistent with normal lighting for residential and retail uses, and would add only a minor increment of the added lighting associated with the 137 related projects. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.**

**f) Mitigation Measures**

The Project meets the criteria for a project in a TPA governed by SB 743/PRC 21099 and City's ZI No. 2452 and, as such, the aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452. Moreover, the Project would not result in significant aesthetic impacts with respect to historical resources. Mitigation is not required.

### **g) Level of Significance After Mitigation**

As discussed above, with respect to aesthetic impacts other than those related to historic resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452. The Project would not result in significant impacts related to aesthetic impacts to historical resources.

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# **IV. Environmental Impact Analysis**

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## **B. Air Quality**

### **1. Introduction**

This section assesses the Project's air quality impacts, as well as cumulative impacts, generated during construction and operation. The analysis also assesses the consistency of the Project with the air quality policies set forth within the South Coast Air Quality Management District (SCAQMD)'s Air Quality Management Plan (AQMP) and the City of Los Angeles General Plan. The analysis of Project-generated air pollutant emissions focuses on whether the Project would cause an exceedance of an ambient air pollutant standard or SCAQMD significance threshold. This section relies on the information, data, and assumptions, which are described in subsection IV.B.3.a). Calculation worksheets and model outputs are provided in the *Air Quality Technical Appendix* prepared by ESA included in Appendix C-1 of this Draft EIR, unless otherwise stated.

### **2. Environmental Setting**

#### **a) Air Quality Background**

The Federal Clean Air Act (CAA) was enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990.<sup>1</sup> The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.<sup>2</sup> The United States Environmental Protection Agency (USEPA) is responsible for the implementation and enforcement of the CAA, which established the federal National Ambient Air Quality Standards (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). Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants.

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of California to achieve and maintain the California Ambient Air Quality Standards (CAAQS). The California Air Resources Board (CARB), a part of the California Environmental

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<sup>1</sup> 42 United States Code §7401 et seq. (1970).

<sup>2</sup> Summary of the Clean Air Act, <https://www.epa.gov/laws-regulations/summary-clean-air-act>.

Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs within California. 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, on which it works closely with the federal government and the regional air districts. The SIP is required in order for the State to take over implementation of the federal CAA from the USEPA.

Criteria air pollutants have been recognized as causing notable health problems and damage to the environment either directly or in reaction with other pollutants, when they are present in elevated concentrations in the atmosphere. Such pollutants have been identified and are regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. These criteria air pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, state, regional, and local regulatory agencies. The federal criteria air pollutants include: ozone ( $O_3$ ); nitrogen dioxide ( $NO_2$ ); carbon monoxide ( $CO$ ); sulfur dioxide ( $SO_2$ ); respirable particulate matter ( $PM_{10}$ ); fine particulate matter ( $PM_{2.5}$ ); and lead ( $Pb$ ).<sup>3,4,5</sup> The State criteria pollutants include, in addition: sulfates ( $SO_4^{2-}$ ); hydrogen sulfide ( $H_2S$ ); visibility-reducing particles; and vinyl chloride.<sup>6</sup> These pollutants are described below.

## **b) Air Pollutants and Potential Health Effects**

### **(1) Federal and State Regulated Criteria Pollutants and Ozone Precursors**

#### **(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

<sup>3</sup> California Air Resources Board, California Ambient Air Quality Standards, <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>. Accessed August 2019.

<sup>4</sup> South Coast Air Quality Management District, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caoqs-feb2016.pdf?sfvrsn=14>. Accessed August 2019.

<sup>5</sup> United States Environmental Protection Agency, Criteria Air Pollutants, NAAQS Table, <https://www.epa.gov/criteria-air-pollutants>. Accessed August 2019.

<sup>6</sup> California Air Resources Board, California Ambient Air Quality Standards (CAAQS), 2019, [https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf?\\_ga=2.121564168.1600362308.1561077088-83961839.1526338943](https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf?_ga=2.121564168.1600362308.1561077088-83961839.1526338943). Accessed August 2019.

wheezing and shortness of breath.<sup>7</sup> 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.<sup>8</sup> 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.<sup>9</sup> 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.<sup>10</sup> 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.<sup>11</sup> 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.<sup>12</sup> 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.<sup>13</sup> 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 symptoms and avoid harmful exposures.<sup>14</sup> Further research may be able to better distinguish between health effects in children and adults.<sup>15</sup>

<sup>7</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution, last updated July 30, 2019, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed August 2019.

<sup>8</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution, last updated July 30, 2019, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed August 2019.

<sup>9</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution, last updated July 30, 2019, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed August 2019.

<sup>10</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed August 2019.

<sup>11</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution, last updated July 30, 2019, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed August 2019.

<sup>12</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution, last updated July 30, 2019, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed August 2019.

<sup>13</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed August 2019.

<sup>14</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed August 2019.

<sup>15</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed August 2019.

(b) *Volatile Organic Compounds (VOCs)*

VOCs are organic chemical compounds of carbon; although they are not “criteria” pollutants themselves, they react with NO<sub>x</sub> to form ozone, and are regulated in order to prevent the formation of ozone.<sup>16</sup> 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.<sup>17</sup> VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and the use of consumer products (e.g., architectural coatings, etc.).<sup>18</sup>

(c) *Nitrogen Dioxide (NO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>)*

NO<sub>x</sub> is a term that refers to a group of compounds containing nitrogen and oxygen. Among these, the primary compounds of concern for air quality include nitrogen dioxide (NO<sub>2</sub>) and nitric oxide (NO). Ambient air quality standards have been promulgated for NO<sub>2</sub>, which is a reddish-brown, reactive gas.<sup>19</sup> The principle form of NO<sub>x</sub> produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> referred to as NO<sub>x</sub>.<sup>20</sup> Major sources of NO<sub>x</sub> include emissions from cars, trucks and buses, power plants, and off-road equipment.<sup>21</sup> The terms NO<sub>x</sub> and NO<sub>2</sub> are sometimes used interchangeably. However, the term NO<sub>x</sub> is typically used when discussing emissions, usually from combustion-related activities, and the term NO<sub>2</sub> is typically used when discussing ambient air quality standards. Where NO<sub>x</sub> 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<sub>x</sub> emissions would oxidize in the atmosphere to form NO<sub>2</sub>. According to the USEPA, short-term exposures to NO<sub>2</sub> 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<sub>2</sub> may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.<sup>22</sup> According to CARB, controlled human

<sup>16</sup> United States Environmental Protection Agency, Technical Overview of Volatile Organic Compounds, last updated April 12, 2017, <https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds>. Accessed August 2019.

<sup>17</sup> California Air Resources Board, Toxic Air Contaminants Monitoring, Volatile Organic Compounds, last reviewed June 9, 2016.

<sup>18</sup> California Air Resources Board, Toxic Air Contaminants Monitoring, Volatile Organic Compounds, last reviewed June 9, 2016.

<sup>19</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>20</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>21</sup> United States Environmental Protection Agency, Nitrogen Dioxide (NO<sub>2</sub>) Pollution, last updated September 8, 2016, <https://www.epa.gov/no2-pollution/basic-information-about-no2>. Accessed August 2019.

<sup>22</sup> United States Environmental Protection Agency, Nitrogen Dioxide (NO<sub>2</sub>) Pollution, last updated September 8, 2016, <https://www.epa.gov/no2-pollution/basic-information-about-no2>. Accessed August 2019.



exposure studies show that NO<sub>2</sub> exposure can intensify responses to allergens in allergic asthmatics.<sup>23</sup> In addition, a number of epidemiological studies have demonstrated associations between NO<sub>2</sub> exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.<sup>24</sup> Infants and children are particularly at risk from exposure to NO<sub>2</sub> because they have disproportionately higher exposure to NO<sub>2</sub> than adults due to their faster breathing rate for their body weight and their typically greater outdoor exposure duration; in adults, the greatest risk from exposure to NO<sub>2</sub> is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.<sup>25</sup> CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO<sub>2</sub> and that there is only limited information for NO and NO<sub>x</sub>, as well as large uncertainty in relating health effects to NO or NO<sub>x</sub> exposure.<sup>26</sup> NO<sub>2</sub> can also injure vegetation, including trees, forests, and crops, and contribute to reducing visibility.<sup>27</sup> It is an important precursor of ozone, and a key agent in the formation of several airborne toxic substances.<sup>28</sup>

(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 resulting from mobile sources.<sup>29</sup> 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.<sup>30</sup> 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

<sup>23</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>24</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed January 2019.

<sup>25</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>26</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>27</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>28</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed August 2019.

<sup>29</sup> California Air Resources Board, Carbon Monoxide & Health, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed August 2019.

<sup>30</sup> United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air, last updated September 8, 2016, <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>. Accessed August 2019.

especially vulnerable to the effects of CO when exercising or under increased stress.<sup>31</sup> In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.<sup>32</sup> According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.<sup>33</sup> 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.<sup>34</sup> 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.<sup>35</sup>

(e) *Sulfur Dioxide (SO<sub>2</sub>)*

According to the USEPA, the largest source of sulfur dioxide (SO<sub>2</sub>) emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities; smaller sources of SO<sub>2</sub> 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.<sup>36</sup> 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.<sup>37</sup> According to the USEPA, short-term exposures to SO<sub>2</sub> can harm the human respiratory system and make breathing difficult.<sup>38</sup> 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<sub>2</sub> (above 1 part per million (ppm)) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary

<sup>31</sup> United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air, last updated September 8, 2016, <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>. Accessed August 2019.

<sup>32</sup> United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air, last updated September 8, 2016, <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>. Accessed August 2019.

<sup>33</sup> California Air Resources Board, Carbon Monoxide & Health, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed August 2019.

<sup>34</sup> California Air Resources Board, Carbon Monoxide & Health, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed August 2019.

<sup>35</sup> California Air Resources Board, Carbon Monoxide & Health, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed August 2019.

<sup>36</sup> United States Environmental Protection Agency, Sulfur Dioxide (SO<sub>2</sub>) Pollution, last updated April 2, 2019, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>. Accessed August 2019.

<sup>37</sup> California Air Resources Board, Final Regulation Order, Amendments to the California Diesel Fuel Regulations, Amend Section 2281, Title 13, California Code of Regulations, approved July 15, 2004, <https://ww3.arb.ca.gov/regact/ulsd2003/fro2.pdf>. Accessed August 2019.

<sup>38</sup> United States Environmental Protection Agency, Sulfur Dioxide (SO<sub>2</sub>) Pollution, last updated April 2, 2019, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>. Accessed August 2019.

function, and increased risk of mortality.<sup>39</sup> Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO<sub>2</sub>.<sup>40,41</sup>

(f) *Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)*

Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air.<sup>42</sup> 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.<sup>43</sup> Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers and smaller (PM<sub>10</sub>); and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM<sub>2.5</sub>).<sup>44</sup> Thus, PM<sub>2.5</sub> comprises a portion or a subset of PM<sub>10</sub>. Sources of PM<sub>10</sub> emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.<sup>45</sup> Sources of PM<sub>2.5</sub> emissions include combustion of gasoline, oil, diesel fuel, or wood.<sup>46</sup> PM<sub>10</sub> and PM<sub>2.5</sub> may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO<sub>2</sub>, NO<sub>x</sub>, and certain organic compounds.<sup>47</sup> According to CARB, both PM<sub>10</sub> and PM<sub>2.5</sub> can be inhaled, with some depositing throughout the airways; PM<sub>10</sub> is more likely to deposit on the surfaces of the larger airways of the upper region of the lung while PM<sub>2.5</sub> 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.<sup>48</sup>

<sup>39</sup> California Air Resources Board, Sulfur Dioxide & Health, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed August 2019.

<sup>40</sup> California Air Resources Board, Sulfur Dioxide & Health, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed August 2019.

<sup>41</sup> United States Environmental Protection Agency, Sulfur Dioxide (SO<sub>2</sub>) Pollution, last updated April 2, 2019, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>. Accessed August 2019.

<sup>42</sup> United States Environmental Protection Agency, Particulate Matter (PM) Pollution, last updated November 14, 2018, <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics>. Accessed August 2019.

<sup>43</sup> United States Environmental Protection Agency, Particulate Matter (PM) Pollution, last updated November 14, 2018, <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics>. Accessed August 2019.

<sup>44</sup> United States Environmental Protection Agency, Particulate Matter (PM) Pollution, last updated November 14, 2018, <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics>. Accessed August 2019.

<sup>45</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>46</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>47</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>48</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

Short-term (up to 24 hours duration) exposure to PM<sub>10</sub> has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits.<sup>49</sup> The effects of long-term (months or years) exposure to PM<sub>10</sub> are less clear, although studies suggest a link between long-term PM<sub>10</sub> exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.<sup>50</sup> Short-term exposure to PM<sub>2.5</sub> 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 PM<sub>2.5</sub> has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.<sup>51</sup> According to CARB, populations most likely to experience adverse health effects with exposure to PM<sub>10</sub> and PM<sub>2.5</sub> 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 PM<sub>10</sub> and PM<sub>2.5</sub> 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.<sup>52</sup>

(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.<sup>53</sup> 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.<sup>54</sup> 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.<sup>55</sup> The lead

<sup>49</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>50</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>51</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>52</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), last reviewed August 10, 2017, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed August 2019.

<sup>53</sup> United States Environmental Protection Agency, Lead Air Pollution, last updated November 29, 2017, <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>. Accessed August 2019.

<sup>54</sup> United States Environmental Protection Agency, Lead Air Pollution, last updated November 29, 2017, <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>. Accessed August 2019.

<sup>55</sup> United States Environmental Protection Agency, Lead Air Pollution, last updated November 29, 2017, <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>. Accessed August 2019.

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.<sup>56</sup> 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.<sup>57</sup>

## (2) State Regulated Criteria Pollutants

### (a) Sulfates ( $\text{SO}_4^{2-}$ )

Sulfates in the environment occur as a result of  $\text{SO}_2$  (sulfur dioxide) being converted to  $\text{SO}_4^{2-}$  compounds in the atmosphere where sulfur is first oxidized to  $\text{SO}_2$  during the combustion process of sulfur containing, petroleum-derived fuels (e.g., gasoline and diesel fuel).<sup>58</sup> Exposure to  $\text{SO}_4^{2-}$ , which is a component of  $\text{PM}_{2.5}$ , results in health effects similar to those from exposure to  $\text{PM}_{2.5}$  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.<sup>59</sup> Population groups with higher risks of experiencing adverse health effects with exposure to  $\text{SO}_4^{2-}$  include children, asthmatics, and older adults who have chronic heart or lung diseases.<sup>60</sup>

### (b) Hydrogen Sulfide ( $\text{H}_2\text{S}$ )

$\text{H}_2\text{S}$  is a colorless gas with a strong odor of rotten eggs. The most common sources of  $\text{H}_2\text{S}$  emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields.<sup>61</sup> Industrial sources of  $\text{H}_2\text{S}$  include petrochemical plants and kraft paper mills<sup>62</sup>.  $\text{H}_2\text{S}$  is also formed during bacterial decomposition of human and animal wastes, and is present in emissions from sewage treatment facilities and landfills.<sup>63</sup> Exposure to  $\text{H}_2\text{S}$  can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 ppm, which is

<sup>56</sup> California Air Resources Board, Lead & Health, <https://ww2.arb.ca.gov/resources/lead-and-health>. Accessed August 2019.

<sup>57</sup> California Air Resources Board, Lead & Health, <https://ww2.arb.ca.gov/resources/lead-and-health>. Accessed August 2019.

<sup>58</sup> California Air Resources Board, Sulfate & Health, <https://ww2.arb.ca.gov/resources/sulfate-and-health>. Accessed August 2019.

<sup>59</sup> California Air Resources Board, Sulfate & Health, <https://ww2.arb.ca.gov/resources/sulfate-and-health>. Accessed August 2019.

<sup>60</sup> California Air Resources Board, Sulfate & Health, <https://ww2.arb.ca.gov/resources/sulfate-and-health>. Accessed August 2019.

<sup>61</sup> California Air Resources Board, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>. Accessed August 2019.

<sup>62</sup> California Air Resources Board, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>. Accessed August 2019.

<sup>63</sup> California Air Resources Board, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>. Accessed August 2019.

considerably higher than the odor threshold.<sup>64</sup> H<sub>2</sub>S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.<sup>65</sup> According to CARB, there are insufficient data available to determine whether or not some groups are at greater risk than others.<sup>66</sup>

#### (c) *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.<sup>67</sup> Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM<sub>10</sub> and PM<sub>2.5</sub> as discussed above.<sup>68</sup>

#### (d) *Vinyl Chloride*

Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes; other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.<sup>69</sup> Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches, while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.<sup>70</sup> Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings;

<sup>64</sup> California Air Resources Board, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>. Accessed August 2019.

<sup>65</sup> California Air Resources Board, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>. Accessed August 2019.

<sup>66</sup> California Air Resources Board, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>. Accessed August 2019.

<sup>67</sup> California Air Resources Board, Visibility-Reducing Particles and Health, last reviewed October 11, 2016, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/vrp/vrp.htm> Accessed August 2019.

<sup>68</sup> California Air Resources Board, Visibility-Reducing Particles and Health, last reviewed October 11, 2016, <https://ww3.arb.ca.gov/research/aaqs/common-pollutants/vrp/vrp.htm>. Accessed August 2019.

<sup>69</sup> California Air Resources Board, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>. Accessed August 2019.

<sup>70</sup> California Air Resources Board, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>. Accessed August 2019.

however, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.<sup>71</sup>

### (3) Toxic Air Contaminants

In addition to criteria pollutants, the SCAQMD periodically assesses levels of Toxic Air Contaminates (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655 as:

*“... 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 toxic air contaminant 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.<sup>72</sup> Diesel particulate matter has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. Diesel particulate matter 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.

Increased 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.<sup>73</sup> Increased diesel particulate matter exposure levels and resultant potential health effects may be higher in proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities.<sup>74, 75</sup> 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

<sup>71</sup> California Air Resources Board, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>. Accessed August 2019.

<sup>72</sup> California Air Resources Board, Overview: Diesel Exhaust and Health, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. Accessed August 2019.

<sup>73</sup> California Air Resources Board, Overview: Diesel Exhaust and Health, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. Accessed August 2019.

<sup>74</sup> California Air Resources Board, Overview: Diesel Exhaust and Health, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. Accessed August 2019.

<sup>75</sup> United States Department of Labor, Occupational Safety and Health Administration, Diesel Exhaust/Diesel Particulate Matter, [https://www.osha.gov/dts/hazardalerts/diesel\\_exhaust\\_hazard\\_alert.html](https://www.osha.gov/dts/hazardalerts/diesel_exhaust_hazard_alert.html). Accessed August 2019.

children; (5) Lung cancer; and (6) Premature deaths for people with heart or lung disease.<sup>76,77</sup>

## c) Regulatory Framework

### (1) Federal

#### (a) *Federal Clean Air Act (CAA) and the National Ambient Air Quality Standards (NAAQS)*

As stated above, the Federal CAA, first enacted in 1955, established the NAAQS and specifies future dates for achieving compliance. It also requires the USEPA to designate areas as attainment, nonattainment, or maintenance, and mandates that each state submit and implement a SIP for each criteria pollutant for which the state has not achieved the applicable NAAQS.

The NAAQS were amended in July 1997 to include an eight-hour standard for ozone and to adopt a NAAQS for PM<sub>2.5</sub>. The NAAQS were also amended in September 2006 to include an established methodology for calculating PM<sub>2.5</sub>, as well to revoke the annual PM<sub>10</sub> 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 have been set at levels considered to be both protective of public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety, and protective of public welfare, including against decreased visibility and damage to animals, crops, vegetation, and buildings.<sup>78,79</sup>

In addition to addressing criteria pollutants, Title I also includes air toxics provisions which require the 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, the 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.

<sup>76</sup> California Air Resources Board, Overview: Diesel Exhaust and Health, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. Accessed August 2019.

<sup>77</sup> California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, 2008, <https://ww3.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf>. Accessed August 2019.

<sup>78</sup> United States Environmental Protection Agency, NAAQS Table, 2018, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed August 2019.

<sup>79</sup> California Air Resources Board, California Ambient Air Quality Standards (CAAQS), 2019, [https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf?\\_ga=2.121564168.1600362308.1561077088-83961839.1526338943](https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf?_ga=2.121564168.1600362308.1561077088-83961839.1526338943). Accessed August 2019.



**TABLE IV.B-1  
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>c,e</sup>	Secondary <sup>c,f</sup>	Method <sup>g</sup>
O <sub>3</sub> <sup>h</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
NO <sub>2</sub> <sup>i</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemi- luminescence	100 ppb (188 µg/m <sup>3</sup> )	None	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		53 ppb (100 µg/m <sup>3</sup> )	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non- Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	None	Non- Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
SO <sub>2</sub> <sup>j</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence ; Spectro- photometry (Pararosanilin e Method) <sup>9</sup>
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>j</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>j</sup>	—	
PM10 <sup>k</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
PM2.5 <sup>k</sup>	24 Hour	No Separate State Standard		35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 µg/m <sup>3 k</sup>	15 µg/m <sup>3</sup>	

**TABLE IV.B-1  
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>c,e</sup>	Secondary <sup>c,f</sup>	Method <sup>g</sup>
Lead <sup>l,m</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>m</sup>	Same as Primary Standard	
	Rolling 3-Month Average <sup>m</sup>	--		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>n</sup>	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 <sub>4</sub> )	24 Hour	25 µg/m <sup>3</sup>	Ion Chroma-tography	No Federal Standards		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	No Federal Standards		
Vinyl Chloride <sup>l</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chroma-tography	No Federal Standards		

<sup>a</sup> California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, 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.

<sup>b</sup> 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 PM<sub>10</sub>, 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 (µg/m<sup>3</sup>) is equal to or less than one. For PM<sub>2.5</sub>, 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.

<sup>c</sup> 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.

<sup>d</sup> Any equivalent procedure which can be shown to the satisfaction of the California Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

<sup>e</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

<sup>f</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

<sup>g</sup> Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

<sup>h</sup> On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

<sup>i</sup> 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.

<sup>j</sup> On June 2, 2010, a new 1-hour SO<sub>2</sub> 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<sub>2</sub> 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.

**TABLE IV.B-1  
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>c,e</sup>	Secondary <sup>c,f</sup>	Method <sup>g</sup>
<sup>k</sup> On December 14, 2012, the national annual PM <sub>2.5</sub> primary standard was lowered from 15 µg/m <sup>3</sup> to 12.0 µg/m <sup>3</sup> .						
<sup>l</sup> 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.						
<sup>m</sup> The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m <sup>3</sup> 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.						
<sup>n</sup> 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, <a href="https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf">https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf</a> . Accessed August 2019.						

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<sub>x</sub> emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

## (2) State

### (a) *California Clean Air Act (CCAA) and the California Ambient Air Quality Standards (CAAQS)*

As discussed above, the California Clean Air Act (CCAA), signed into law in 1988, requires all areas of California to achieve and maintain the CAAQS. While the CAAQS regulate the same criteria pollutants as the NAAQS (plus four additional California-only pollutants), in general, the CAAQS are more stringent than the NAAQS. CARB has primary responsibility for ensuring implementation of the California CAA,<sup>80</sup> responding to the federal CAA planning requirements applicable to the State, and regulating emissions from motor vehicles and consumer products within the State.<sup>81,82</sup> Table IV.B-1 shows the CAAQS currently in effect for each of the federally recognized criteria pollutants as well as the four additional pollutants recognized by the State. Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. With respect to the State-identified criteria pollutants (i.e., sulfates, hydrogen sulfide, visibility reducing particles, and vinyl chloride), they would either not be emitted by the

<sup>80</sup> Chapter 1568 of the Statutes of 1988.

<sup>81</sup> California Air Resources Board, Mobile Sources Program Portal, last reviewed July 25, 2016, <https://ww3.arb.ca.gov/msprog/msprog.htm>. Accessed August 2019.

<sup>82</sup> California Air Resources Board, Consumer Products Enforcement, last reviewed January 16, 2018, <https://ww3.arb.ca.gov/enf/consprod.htm>. Accessed August 2019.

Project (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). That is, visibility reducing particles are associated with particulate matter emissions and sulfates are associated with SO<sub>x</sub> emissions. Both particulate matter and SO<sub>x</sub> emissions are included in the emissions estimates for the Project.

(b) *Air Quality and Land Use Handbook*

CARB published the *Air Quality and Land Use Handbook*<sup>83</sup> in April 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions. The recommendations provided therein are voluntary and do not constitute requirements or mandates for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines; and (4) avoid siting sensitive receptors within 300 feet of a large gasoline dispensing facility (3.6 million gallons per year or more) or 50 feet of a typical gasoline dispensing facility (less than 3.6 million gallons per year).<sup>84</sup>

(c) *Truck Idling Restrictions*

Section 2485 of Title 13 of the California Code of Regulations (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.<sup>85</sup> In addition, Section 93115 in Title 17 of the CCR states that operations of all stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

(d) *CARB 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 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 time.

<sup>83</sup> California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, 2005, <https://ww3.arb.ca.gov/ch/landuse.htm>. Accessed August 2019.

<sup>84</sup> California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, 2005, <https://ww3.arb.ca.gov/ch/landuse.htm>. Accessed August 2019.

<sup>85</sup> 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 (APA).

In 2008, CARB approved the Truck and Bus regulation to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from existing diesel-fueled vehicles operating in California (13 CCR, Section 2025). The requirements were amended to apply to nearly all diesel-fueled trucks and busses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. For the largest trucks in the fleet, those with a GVWR greater than 26,000 pounds, there are two methods to comply with the requirements. The first way is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over eight years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would meet or exceed the 2010 engine emission standards for NO<sub>x</sub> and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters achieving at least 85 percent removal efficiency, so that by January 1, 2016 their entire fleet is equipped with diesel particulate filters (DPFs). However, DPFs do not typically lower NO<sub>x</sub> emissions. Thus, fleet owners choosing the second option must still comply with the 2010 engine emission standards for their trucks and busses by 2020.

In addition to limiting exhaust from idling trucks, as discussed above, CARB recently 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, adopted by the 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 (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 to begin 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.

(e) *Toxic Air Contaminants*

As discussed above, TACs refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Ambient air quality standards have not been established for TACs, largely because there are hundreds of air toxics, and their effects on health tend to be felt on a local scale rather than on a regional basis.

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 the inception of the program, a number of such substances have been listed (see [ww3.arb.ca.gov/toxics/id/taclist.htm](http://ww3.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.

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 result of those reviews, CARB has promulgated a number of ATCMs, both for mobile and stationary sources (see [ww3.arb.ca.gov/toxics/atcm/atcm.htm](http://ww3.arb.ca.gov/toxics/atcm/atcm.htm)). As discussed above, in 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs. 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 5 minutes at any given time.

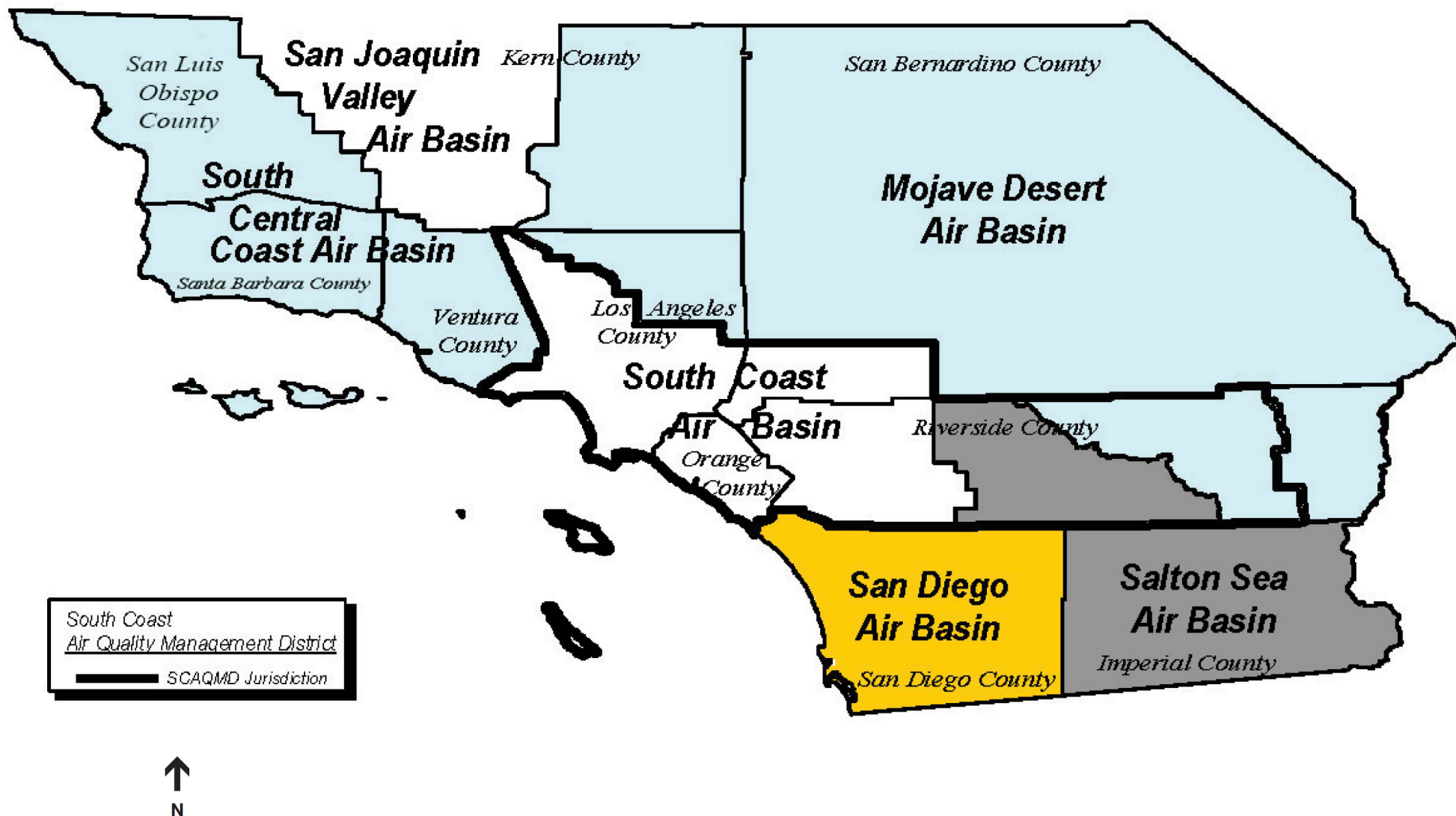
In addition to limiting exhaust from idling trucks, as discussed above, CARB promulgated emission standards for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles. As discussed above, the regulation aims to reduce emissions by the installation of DPFs and encouraging the replacement of older, dirtier engines with newer emission controlled models.

The AB 1807 California Air Toxics 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 “Hot Spots” 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 (SCAQMD)*

The SCAQMD shares responsibility with CARB for ensuring that all state and federal ambient air quality standards are achieved and maintained throughout the South Coast Air Basin (Air Basin). The Air Basin covers an area of over 6,745 square miles that is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and that 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 Geronio Pass portions of Riverside County. **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 Plans (AQMPs)*

To improve the air quality in the Air Basin, the SCAQMD has adopted a series of AQMPs to meet the CAAQS and NAAQS. The 2012 Air Quality Management Plan incorporated the then-current scientific and technological information and planning assumptions, including regional growth projections,<sup>86</sup> to achieve federal standards for air quality in the Air Basin. It 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 recent and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches. Additionally, it 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.

The key undertaking of the 2012 AQMP is to bring the Air Basin into attainment with the NAAQS for the 24-hour PM<sub>2.5</sub> standard. It also intensifies the scope and pace of continued air quality improvement efforts toward meeting the 2024 eight-hour O<sub>3</sub> standard deadline with new measures designed to reduce reliance on the federal CAA Section 182(e)(5) long-term measures for NO<sub>x</sub> 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 four components: (1) Basin-wide and Episodic Short-term PM<sub>2.5</sub> Measures; (2) Contingency Measures; (3) eight-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<sub>2.5</sub> control measures, 16 stationary source 8-hour ozone measures, 10 early action measures for mobile sources and seven early action measures are proposed to accelerate near-zero and zero emission technologies for goods movement related sources, and five on-road and five off-road mobile source control measures. In general, the 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

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<sup>86</sup> South Coast Air Quality Management District, Final 2012 AQMP, 2013, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>. Accessed August 2019.



emissions from on-road and off-road heavy-duty vehicles and equipment.<sup>87</sup> 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<sub>x</sub> 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<sub>x</sub> (SOON) provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation beyond 2014 through the 2023 timeframe.

The SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017.<sup>88</sup> CARB approved the 2016 AQMP on March 23, 2017.<sup>89</sup> 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.<sup>90</sup> The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal non-attainment pollutants ozone and PM<sub>2.5</sub>.<sup>91</sup> While the 2016 AQMP has been adopted by the SCAQMD and CARB, it has not yet received USEPA approval for inclusion in the SIP. Therefore, until such time as the 2016 AQMP has been approved by the USEPA, the 2012 AQMP remains the applicable AQMP for federal air quality planning purposes; however, 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.<sup>92</sup>

(ii) *SCAQMD Air Quality Guidance Documents*

The City of Los Angeles utilizes the SCAQMD's *CEQA Air Quality Handbook* and the SCAQMD's adopted thresholds of significance, which are included in the SCAQMD's

<sup>87</sup> South Coast Air Quality Management District, Final 2012 AQMP, 2013, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>. Accessed August 2019.

<sup>88</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

<sup>89</sup> California Air Resources Board, 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 August 2019.

<sup>90</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

<sup>91</sup> South Coast Air Quality Management District, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, 2016, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2>. Accessed August 2019.

<sup>92</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

Handbook, as guidance documents for the environmental review of development proposals within the Air Basin.<sup>93</sup> 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 its *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 Table A9-5-J1 through A9-5 of the Handbook as they are outdated.<sup>94</sup> The SCAQMD instead recommends using other approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod) software.<sup>95</sup>

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 provides guidance when considering impacts to sensitive receptors from facilities that emit TAC emissions.<sup>96</sup> SCAQMD's 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, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's guidance document provides 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.

The SCAQMD has published another guidance document entitled the *Final Localized Significance Threshold Methodology* for CEQA Evaluations that is intended to provide guidance in evaluating the localized effects from mass emissions during construction and operations.<sup>97</sup> The SCAQMD adopted additional guidance regarding PM<sub>2.5</sub> in a document called *Final Methodology to Calculate Particulate Matter (PM)<sub>2.5</sub> and PM<sub>2.5</sub> Significance Thresholds*.<sup>98</sup> This latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

<sup>93</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook* (1993), 1993, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019.

<sup>94</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook* (1993), 1993, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019.

<sup>95</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook* (1993), 1993, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019.

<sup>96</sup> South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, 2005, <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>. Accessed August 2019.

<sup>97</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

<sup>98</sup> South Coast Air Quality Management District, *Final Methodology to Calculate Particulate Matter (PM)<sub>2.5</sub> and PM<sub>2.5</sub> Significance Thresholds*, 2006, <http://www.aqmd.gov/home/rules->

SCAQMD has adopted two rules to limit cancer and non-cancer health risks from permit facilities that emit identified TACs located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified permit 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 “Hot Spots” program, including implementation of risk reduction plans for significant risk facilities.<sup>99, 100, 101</sup> However, since the Project is not a existing or new source of SCAQMD identified TACs under Rule 1401 and Rule 1402, it does not require a permit from SCAQMD regarding TACs.

(iii) *SCAQMD Rules and Regulations*

The SCAQMD has developed many rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards. The Project may be subject to one or more of the following SCAQMD rules and regulations:

**Regulation IV – Prohibitions:** This regulation sets forth restrictions regarding visible emissions, odor nuisance, fugitive dust, various types of pollutant emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules which may apply to the Project:

- **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.
- **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's property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) 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

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compliance/ceqa/air-quality-analysis-handbook/pm-2-5-significance-thresholds-and-calculation-methodology. Accessed August 2019.

<sup>99</sup> South Coast Air Quality Management District, Rule 1401. New Source Review of Toxic Air Contaminants, Adopted June 1, 1990, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>. Accessed August 2019.

<sup>100</sup> South Coast Air Quality Management District, Rule 1402. Control of Toxic Air Contaminants from Existing Sources, Adopted April 8, 1994, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>. Accessed August 2019.

<sup>101</sup> California Air Resources Board, AB 2588 Air Toxics "Hot Spots" Program, last reviewed April 25, 2016, <https://ww3.arb.ca.gov/ab2588/ab2588.htm>. Accessed August 2019.

adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

**Regulation XI – Source Specific Standards:** Regulation XI sets emissions standards for different specific sources. The following is a list of rules which may apply to the Project:

- **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 1138 – Control of Emissions from Restaurant Operations:** This rule specifies emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- **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<sub>x</sub> emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 – PM<sub>10</sub> 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 PM<sub>10</sub> 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 XIII – New Source Review (NSR):** Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and modified sources located in areas that do not meet the CAA standards (“non-attainment” areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply BACT. Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

**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. The following is a list of rules which may apply to the Project:

- **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, 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 asbestos-containing materials.

- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition engines (e.g., diesel-fueled 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.

(b) *Southern California Association of Governments (SCAG)*

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization for the majority of the Southern California region and is the largest Metropolitan Planning Organization in the nation. With regard to air quality planning, SCAG adopted the *2016 Regional Transportation Plan/Sustainable Communities Strategy* (2016 RTP/SCS) in April 2016, which addresses regional development and growth forecasts. The 2016 RTP/SCS forms the basis for the land use and transportation control portions of the AQMP, and its growth forecasts are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RTP/SCS and the AQMP are based on projections that originate with local jurisdictions.

SCAG is required to adopt an SCS along with its RTP pursuant to SB 375 (Chapter 728, Statutes of 2008), which required the development of regional targets for reducing passenger vehicle greenhouse gas emissions. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations, to set regional greenhouse gas (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 SCAG, within whose jurisdiction the City of Los Angeles is located. SCAG's target is a per capita reduction of eight percent for 2020 and 13 percent for 2035 compared to the 2005 baseline.<sup>102</sup> SCAG's 2016 RTP/SCS meets or exceeds these targets, lowering greenhouse gas emissions (below 2005 levels) by eight percent by 2020; 18 percent by 2035; and 21 percent by 2040.<sup>103</sup> Of note, the proposed reduction targets explicitly exclude emission reductions expected from AB 1493 and the low carbon fuel standard regulations. Compliance with and implementation of 2016 RTP/SCS policies

<sup>102</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 8, <http://scagrtpscsc.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

<sup>103</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 153, <http://scagrtpscsc.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

and strategies would also reduce per capita criteria air pollutant emissions due to reduced per capita vehicle miles traveled (VMT).

SCAG's SCS is "built on a foundation of contributions from communities, cities, counties and other local agencies" and "based on local general plans as well as input from local governments."<sup>104</sup> The SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and 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.

#### (4) Local

##### (a) *City of Los Angeles Air Quality Element*

Local jurisdictions, such as the City of Los Angeles, 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 proposed 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 City facilities and 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;

<sup>104</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 75, <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

- 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 of Los Angeles is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, local governments can 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.

*(b) City of Los Angeles Freeway Adjacent Advisory Notice for Sensitive Uses*

The Advisory Notice for Freeway Adjacent Projects (Zoning Information File No. 2427), effective September 17, 2018, is an informational notification to inform applicants for all new projects and expansions of existing development involving sensitive uses within 1,000 feet of freeways.<sup>105</sup> The advisory notice calls attention to existing adopted goals, objectives, policies, and programs in the General Plan that address land use compatibility with respect to sites near freeways for new residential development and sensitive land uses. Although Zoning Information File 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. In the interest of providing information to the public and creating healthy communities, the City Planning Commission advises that applicants for projects requiring discretionary approval that are located within 1,000 feet of a freeway, and that include residential units and other sensitive uses, perform a health risk assessment (HRA) to enable applicants to make informed decisions about site planning from the earliest stages of project design. Consistent with this direction, the City adopted Ordinance No. 184,245 in 2016, which, among other things, requires the provision of air filtration media that achieves a Minimum Efficiency Reporting Value (MERV) of 13 for regularly occupied areas of buildings located within 1,000 feet of a freeway. This requirement is now codified in Chapter IX, Article 9, Division 4, Section 99.04.504.6 of the LAMC.

For informational purposes, a Freeway HRA has been prepared for Project operations, which evaluates potential health risk impacts to future Project residents from freeway TAC emissions, and is discussed in Section IV.H, *Land Use and Planning*, and briefly in this

<sup>105</sup> City of Los Angeles, Department of Planning, Zoning Information File ZI NO. 2427 Freeway Adjacent Advisory Notice, 2018, <http://zimas.lacity.org/documents/zoneinfo/ZI2427.pdf>. Accessed August 2019.

Section IV.B, *Air Quality*, of this Draft EIR, with supporting calculation files provided in Appendix C-2 of this Draft EIR.

## d) Existing Conditions

### (1) Regional Air Quality

#### (a) Criteria Pollutants

The extent and severity of pollutant concentrations in the Air Basin is 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. The greatest air pollution impacts throughout the Air Basin typically occur from June through September, which is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion 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.

**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. As shown in Table IV.B-2, the Air Basin is designated under federal or state ambient air quality standards as nonattainment for ozone, PM<sub>10</sub>, and fine particulate matter PM<sub>2.5</sub>. 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.<sup>106</sup>

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four major source classifications: point sources, area sources, on-road sources, and off-road sources. Point and area sources are the two major subcategories of stationary sources.<sup>107</sup> 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

<sup>106</sup> SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

<sup>107</sup> South Coast Air Quality Management District, Final 2016 AQMP, 2017, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 2019.



sources consist of two main subcategories: On-road sources (such as cars and trucks) and off-road sources (such as heavy construction equipment).

**TABLE IV.B-2**  
**SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)**

<b>Pollutant</b>	<b>National Standards (NAAQS)</b>	<b>California Standards (CAAQS)</b>
O <sub>3</sub> (1-hour standard)	N/A <sup>a</sup>	Non-attainment – Extreme
O <sub>3</sub> (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment
SO <sub>2</sub>	Attainment	Attainment
PM <sub>10</sub>	Attainment	Non-attainment
PM <sub>2.5</sub>	Non-attainment – Serious	Non-attainment
Lead (Pb)	Non-attainment (Partial) <sup>b</sup>	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride <sup>c</sup>	N/A	N/A

N/A = not applicable

<sup>a</sup> The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

<sup>b</sup> Partial Non-attainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

<sup>c</sup> 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: U.S. EPA, The Green Book Non-Attainment Areas for Criteria Pollutants, <https://www.epa.gov/green-book>; CARB, Area Designations Maps/State and National, <https://ww3.arb.ca.gov/design/adm/adm.htm>. Accessed November 2018.

### (b) *Air Toxics*

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 diesel particulate matter emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel trucks and stationary emergency generators.

#### (i) *Existing Health Risk in the Air Basin*

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 long-term 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 1,023 in one million for the average of 10 fixed monitoring sites and 897 in one million for the population-weighted risk.<sup>108</sup> The relative reduction in the overall long-term inhalation cancer risk from the MATES IV results compared to MATES III was about 65 percent and 57 percent reduction in risk, respectively.

Approximately 68 percent of the airborne carcinogenic 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 is attributed to stationary sources (which include industries and certain other businesses, such as dry cleaners and chrome plating operations).<sup>109</sup> 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.<sup>110</sup> The reductions were attributed to air quality control regulations and improved emission control technologies. In addition to air toxics, MATES IV included 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 trafficked freeways or near industrial areas were characterized by higher levels of black carbon and ultrafine particles than were more rural sites.

## (2) Local Air Quality

### (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<sub>2</sub>, CO, SO<sub>2</sub>, Pb, PM<sub>10</sub>, and PM<sub>2.5</sub>. The most recent data available from the SCAQMD for this monitoring station are from years 2016 to 2018.<sup>111</sup> The pollutant concentration data for these years are summarized in **Table IV.B-3, Ambient Air Quality Data in the Project Vicinity**. As shown in Table IV.B-3, the CAAQS

<sup>108</sup> South Coast Air Quality Management District, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, 2-11, <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf?sfvrsn=7>. Accessed August 2019.

<sup>109</sup> South Coast Air Quality Management District, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, p. ES-2, <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf?sfvrsn=7>. Accessed August 2019.

<sup>110</sup> South Coast Air Quality Management District, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, 2015, p. 6-1, <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf?sfvrsn=7>. Accessed August 2019.

<sup>111</sup> 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.

and NAAQS were not exceeded in the Project Site vicinity for most pollutants between 2016 and 2018, except for ozone and particulate matter (both PM10 and PM2.5).

**TABLE IV.B-3  
AMBIENT AIR QUALITY IN THE PROJECT VICINITY**

<b>Pollutant/Standard <sup>a</sup></b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>Ozone, O<sub>3</sub> (1-hour)</b>			
Maximum Concentration (ppm)	0.103	0.116	0.098
Days > CAAQS (0.09 ppm)	2	6	2
<b>Ozone, O<sub>3</sub> (8-hour)</b>			
Maximum Concentration (ppm)	0.078	0.086	0.073
4 <sup>th</sup> 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
<b>Nitrogen Dioxide, NO<sub>2</sub> (1-hour)</b>			
Maximum Concentration (ppm)	0.065	0.081	0.071
Days > CAAQS (0.18 ppm)	0	0	0
98 <sup>th</sup> Percentile Concentration (ppm)	0.061	0.062	0.057
Days > NAAQS (0.100 ppm)	0	0	0
<b>Nitrogen Dioxide, NO<sub>2</sub> (Annual)</b>			
Annual Arithmetic Mean (0.030 ppm)	0.020	0.021	0.019
<b>Carbon Monoxide, CO (1-hour)</b>			
Maximum Concentration (ppm)	1.9	1.9	2.0
Days > CAAQS (20 ppm)	0	0	0
Days > NAAQS (35 ppm)	0	0	0
<b>Carbon Monoxide, CO (8-hour)</b>			
Maximum Concentration (ppm)	1.4	1.6	1.7
Days > CAAQS (9.0 ppm)	0	0	0
Days > NAAQS (9 ppm)	0	0	0
<b>Sulfur Dioxide, SO<sub>2</sub> (1-hour)</b>			
Maximum Concentration (ppm)	0.013	0.006	0.018
Days > CAAQS (0.25 ppm)	0	0	0
99 <sup>th</sup> Percentile Concentration (ppm)	0.003	0.003	0.003
Days > NAAQS (0.075 ppm)	0	0	0
<b>Sulfur Dioxide, SO<sub>2</sub> (24-hour)</b>			
Maximum Concentration (ppm)	0.001	0.001	0.001
Days > CAAQS (0.04 ppm)	0	0	0

**TABLE IV.B-3  
AMBIENT AIR QUALITY IN THE PROJECT VICINITY**

<b>Pollutant/Standard <sup>a</sup></b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>Respirable Particulate Matter, PM10 (24-hour)</b>			
Maximum Concentration ( $\mu\text{g}/\text{m}^3$ )	67	96	81
Samples > CAAQS ( $50 \mu\text{g}/\text{m}^3$ )	18	41	31
Samples > NAAQS ( $150 \mu\text{g}/\text{m}^3$ )	0	0	0
<b>Respirable Particulate Matter, PM10 (Annual)</b>			
Annual Arithmetic Mean ( $20 \mu\text{g}/\text{m}^3$ )	32.4	34.4	34.1
<b>Fine Particulate Matter, PM2.5 (24-hour)</b>			
Maximum Concentration ( $\mu\text{g}/\text{m}^3$ )	44.4	49.2	43.8
98th Percentile Concentration ( $\mu\text{g}/\text{m}^3$ )	27.3	27.8	30.5
Samples > NAAQS ( $35 \mu\text{g}/\text{m}^3$ )	2	5	3
<b>Fine Particulate Matter, PM2.5 (Annual)</b>			
Annual Arithmetic Mean ( $12 \mu\text{g}/\text{m}^3$ )	11.8	11.9	12.6
<b>Lead</b>			
Maximum 30-day average ( $\mu\text{g}/\text{m}^3$ )	0.016	0.017	0.011
Samples > CAAQS ( $1.5 \mu\text{g}/\text{m}^3$ )	0	0	0
Maximum 3-month rolling average ( $\mu\text{g}/\text{m}^3$ )	0.01	0.01	0.01
Days > NAAQS ( $0.15 \mu\text{g}/\text{m}^3$ )	0	0	0

<sup>a</sup> ppm = parts per million;  $\mu\text{g}/\text{m}^3$  = 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, Air Data, [http://www.epa.gov/airdata/ad\\_rep\\_mon.html](http://www.epa.gov/airdata/ad_rep_mon.html), accessed January 2020.

As a result of the Mates IV Study described above, 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 is estimated at 1,150 in one million (compared to an overall South Coast Air Basin-wide risk of 1,023 in one million for the average of 10 fixed monitoring sites).<sup>112</sup> Generally, the risk from air toxics is lower near the coastline; increasing inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports).

<sup>112</sup> South Coast Air Quality Management District, Multiple Air Toxics Exposure Study, MATES IV Carcinogenic Risk Interactive Map, <https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f>. Accessed August 2019.

(b) *Existing Site Emissions*

The Project Site is located within the Hollywood community of Los Angeles, and is currently developed with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings (43 existing multi-family/apartment units total) and associated carports and paved surface parking areas, for a total of 44 dwelling units, all of which would be demolished and removed from the site. Existing emissions are associated with vehicle trips to and from the Project Site, on-site combustion of natural gas for heating and cooking, on-site combustion emissions from a wood burning fireplace and landscaping equipment, and fugitive emissions of VOCs from the use of household products and coatings. While the existing uses on the site currently generate some amount of operational emissions, for the purposes of this analysis, no existing operational air quality emissions are assumed from the existing site and the Project's air quality emissions are conservatively considered to be new operational emissions.

(3) **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 to be 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. Sensitive land uses located within 500 feet of the Project Site that would experience maximum air quality impacts due to the Project are shown in **Figure IV.B-2, Sensitive Receptor Locations Nearest to the Project Site**, and include the following:

- Residential Uses: Existing one- and two-story single-family residences and duplexes are located adjacent to the east and southeast along Vista Del Mar Avenue.
- Residential Uses: Existing five-story mixed-use residential and commercial uses are located to the south of the Project Site, south of the vacant parcel and south of Carlos Avenue.
- Residential Uses: Existing three-story residential lofts are located to the north of the Project Site north of Yucca Street.
- Residential Uses: Existing multi-family residential uses are located to the west of the Project Site west of Argyle Avenue.

All other air quality-sensitive uses are located at greater distances (more than 500 feet) 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.



SOURCE: DigitalGlobe, 2018 (Aerial).

**Figure IV.B-2**  
Sensitive Receptor Locations Nearest the Project Site

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a potentially 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) affecting a substantial number of people.***

For this analysis, the City has determined to adopt the Appendix G checklist questions as its Thresholds. The analysis utilizes factors and considerations identified in the 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 criteria 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 Thresholds Guide.<sup>113</sup>

**Consistency with Applicable Air Quality Plans.** Section 15125 of the CEQA Guidelines 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, PM<sub>10</sub>, and PM<sub>2.5</sub>. SCAQMD methodology recommends that significance thresholds be

<sup>113</sup> 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.<sup>114</sup> 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,<sup>115</sup> 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<sub>x</sub>), PM<sub>10</sub>, or PM<sub>2.5</sub> 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 <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
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<sub>x</sub> 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<sub>2</sub> and/or CO.<sup>116</sup>
- Maximum daily localized emissions of PM<sub>10</sub> and/or PM<sub>2.5</sub> 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 µg/m<sup>3</sup> over 24 hours (SCAQMD Rule 403 control requirement).
- Maximum daily localized emissions of PM<sub>10</sub> and/or PM<sub>2.5</sub> 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 µg/m<sup>3</sup> over 24 hours (SCAQMD Rule 1303 allowable change in concentration).

<sup>114</sup> SCAQMD, CEQA Air Quality Handbook.

<sup>115</sup> SCAQMD, Air Quality Significance Thresholds, 2015.

<sup>116</sup> SCAQMD, Final Localized Significance Threshold Methodology.

- 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.<sup>117</sup> 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:<sup>118</sup>

- 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,<sup>119</sup> the Project would potentially result in a significant impact of an attainment, maintenance, or unclassified pollutant if emissions of CO or SO<sub>2</sub> would exceed the values shown in Table IV.B-4.

**Cumulative Thresholds:** The L.A. CEQA Thresholds Guide states, 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, this Thresholds Guide references the screening criteria, significance thresholds and analysis methodologies in the CEQA Air Quality Handbook to assist in evaluating projects proposed within the City.”<sup>120</sup> In turn, 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

<sup>117</sup> SCAQMD, Final Localized Significance Threshold Methodology.

<sup>118</sup> SCAQMD, CEQA Air Quality Handbook.

<sup>119</sup> SCAQMD, Air Quality Significance Thresholds.

<sup>120</sup> City of Los Angeles, L.A. CEQA Thresholds Guide, 2006. Accessed August 2019.

mitigating air quality impacts of projects.”<sup>121</sup> 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.”<sup>122</sup> The SCAQMD has provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as follows:<sup>123</sup>

*“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 and Appendix G) to assess the Project’s cumulative impacts. While it may theoretically be possible to add emissions from the list of related projects together with the Project’s emissions, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD has established numerical thresholds applicable to the sum of multiple project emissions for comparison purposes. Additionally, a Project’s regional emissions have the potential to affect the Air Basin as a whole, and unlike other environmental issue areas, such as aesthetics or noise, it is not possible to establish a geographical radius around a specific project site within which potential cumulative impacts from regional emissions would be contained. 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 guidance, the potential for the Project’s emissions to result in cumulative air quality impacts is assessed based on the SCAQMD thresholds.

Additionally, the SCAQMD recommends assessing a project’s potential cumulative impacts based on whether it is consistent with the AQMP. Section 15064(h)(3) of the State CEQA Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

<sup>121</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, (1993), 1993, p. iii, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019.

<sup>122</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. 6-1, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019.

<sup>123</sup> South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>. Accessed August 2019.

*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 State CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts were evaluated based on its consistency with the SCAQMD's adopted 2016 AQMP.

## **b) Methodology**

This analysis assesses the potential impacts on regional and local air quality that may occur due to construction and operation of the Project. The specific methodologies used in this analysis are described below. Additional details are provided in the Air Quality Technical Report in Appendix C-1 of this Draft EIR.

### **(1) Existing Project Site Emissions**

As mentioned above under subsection IV.B.2.d)(2)(b), *Existing Site Emissions*, for the purposes of this analysis, no existing operational air quality emissions were assumed from the existing site uses and the Project's air quality emissions are conservatively considered to be new operational emissions.

### **(2) Consistency with Applicable Air Quality Plan**

#### **(a) Consistency with AQMP**

The Project's consistency with the 2016 AQMP is evaluated based on its consistency with the applicable emission control strategies and with the applicable growth projections contained in the 2016 AQMP. The SCAQMD is required, pursuant to the CAA, to reduce emissions of those criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone and PM<sub>2.5</sub>).<sup>124</sup> 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

<sup>124</sup> 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 South Coast Air Quality Management District, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

strategies from SCAG's 2016 RTP/SCS designed to reduce VMT.<sup>125</sup> The 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG.<sup>126</sup> For this reason, projects whose growth is consistent with the assumptions used in the 2016 AQMP 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 those emissions exceed the SCAQMD's thresholds of significance.<sup>127</sup>

#### (b) *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 applicable AQMP. The analysis below provides a side-by-side comparison of each of the relevant provisions in the Air Quality Element with the Project to determine whether the Project would be consistent with those provisions.

### (3) Project Construction

#### (a) *Regional Emissions*

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 demolition, soil handling activities such as excavation and grading, 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

<sup>125</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, p. ES-6, 4-42. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

<sup>126</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, p. 4-42 to 4-44. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

<sup>127</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993), 1993, p. 12-1, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019

estimated using the CalEEMod software, which 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 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.) were 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 the air quality and GHG impacts of land use projects throughout California and is an emissions inventory software program recommended by the SCAQMD.<sup>128</sup> The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. Haul truck trip estimates were based on excavation volumes obtained from the contractor and 10 cubic yards debris-capacity haul trucks, 14 cubic yards soil capacity haul trucks; worker trip estimates were provided by the contractor; and vendor truck trip estimates were based on calculation methodologies in CalEEMod. CalEEMod is based on outputs from the CARB off-road emissions factor (OFFROAD) and on-road emissions factor (EMFAC) models, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles.<sup>129</sup> 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. Construction phasing would include demolition of the existing buildings and associated parking, site clearing, grading, excavation, and subterranean parking and building construction. The Project would export approximately 120,000 cubic yards of soil and generate approximately 5,000 cubic yards of demolition debris (asphalt, interior and exterior building demolition, and general construction debris). Emissions from these activities were estimated by construction phase. It should be noted that the maximum daily emissions were predicted values for the worst-case day and do not represent the emissions that would occur for every day of 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 Air Quality Technical Report for the Project, which is provided in Appendix C-1 of this Draft EIR.

Project construction was modeled to start in 2018, but would commence at a later date. As such, construction impacts would be less than those analyzed 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. As a result, Project-related construction air quality impacts would be lower than the impacts disclosed herein. For emissions modeling purposes, conservatively analyzing the emissions using an earlier construction start date (i.e., 2018), provides for

<sup>128</sup> California Emissions Estimator Model. California Emissions Estimator Model (CalEEMod) Website. Available at: <http://www.caleemod.com>. Accessed August 2019.

<sup>129</sup> California Air Resources Board, CalEEMod User's Guide, p. 35, 41, September 2016, [https://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/01\\_user-39-s-guide2016-3-1.pdf?sfvrsn=2](https://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/01_user-39-s-guide2016-3-1.pdf?sfvrsn=2). Accessed August 2019

a worst-case analysis and full disclosure of potential air quality impacts, as required by CEQA.

#### (b) *Localized Emissions*

The localized effects from the on-site portion of the Project's construction emissions were evaluated at the nearby sensitive receptor locations in accordance with the SCAQMD's *Final Localized Significance Threshold Methodology* (June 2003, revised July 2008).<sup>130</sup> The localized significance thresholds only address NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> 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 was based on this SCAQMD screening criteria. The Project Site is located in the Central Los Angeles area, and is approximately 1.16 acres in size, with the nearest off-site receptors located adjacent to the Project Site to the south along Vista Del Mar. Therefore, the screening criteria used were a one-acre site in the Central Los Angeles area with sensitive receptors located 25 meters away, which accounts for all adjacent off-site sensitive receptors.<sup>131</sup>

### (4) Project Operation

#### (a) *Regional Emissions*

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 VMT for the Project uses were taken from the Project's VMT analysis in the CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California<sup>132</sup>. The EMFAC2017 model was run in the emissions mode (also referred to as the "Burden" mode) and used to generate Air Basin-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.

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

<sup>130</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

<sup>131</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, p. 3-3, 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019. "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

<sup>132</sup> Gibson Transportation Consulting, Inc., *CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California*. Provided in Appendix L-1 of this Draft EIR.

heaters, boilers, and cooking stoves, landscaping equipment, and the use of consumer products.<sup>133</sup> The Project is not expected to contain any large stationary combustion equipment such as large boilers or combustion turbines.

Natural gas usage factors in CalEEMod are based on commercial and residential data from the California Energy Commission 2002 CEUS data adjusted to reflect more recent Title 24 improvements, 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.

Other area-source emissions were estimated separately, outside of the CalEEMod software. Other area sources include charbroiling of meat that may occur on-site during food preparation activities in a restaurant kitchen. Emissions from charbroiling were calculated based on emissions factors available from the SCAQMD.<sup>134</sup> To provide a conservative analysis, it was assumed that the restaurant would charbroil meat with relatively high emission factors (i.e., hamburger and chicken meat). The quantity of meat charbroiled in the restaurant was based on survey data from facilities located in the SCAQMD jurisdiction.<sup>135</sup> The estimated emissions incorporate reductions achieved by compliance with emissions control requirements consistent with SCAQMD Rule 1138.

Stationary sources would include on-site emergency generator capacity, estimated at approximately 250 kilowatts (335 horsepower). The emergency generator 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.

Operational 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. As discussed previously, the purposes of this analysis, no existing operational air quality emissions were assumed from the existing site uses. Therefore, the Project's regional operational emissions are conservatively considered to be new operational emissions. The maximum daily emissions from

<sup>133</sup> California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, 6/13/2003, [https://ww3.arb.ca.gov/msei/2001\\_residential\\_lawn\\_and\\_garden\\_changes\\_in\\_eqpt\\_pop\\_and\\_act.pdf](https://ww3.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf). Accessed August 2019.

<sup>134</sup> South Coast Air Quality Management District, Emission Factors for Commercial Cooking Operations, [http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-1138/par1138pdsr\\_appendixi.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-1138/par1138pdsr_appendixi.pdf?sfvrsn=2). Accessed August 2019.

<sup>135</sup> As cited in: San Joaquin Valley Unified Air Pollution Control District, Final Draft Staff Report Rule 4692 (Commercial Charbroiling), February 21, 2002, [https://ww3.arb.ca.gov/pm/pmmeasures/ceffect/reports/sjvapcd\\_4692\\_report.pdf](https://ww3.arb.ca.gov/pm/pmmeasures/ceffect/reports/sjvapcd_4692_report.pdf). Accessed August 2019.



operation of the Project were compared to the SCAQMD daily regional thresholds of significance.

(b) *Localized Emissions*

(i) *On-Site Emissions*

The localized effects from the on-site portion of the maximum daily emissions from Project operation are evaluated at the nearby sensitive receptor locations in accordance with the SCAQMD's *Final Localized Significance Threshold Methodology* (June 2003, revised July 2008).<sup>136</sup> The localized impacts from operation of the Project were assessed similar to the localized construction emissions, as discussed previously. For further explanation, please see Appendix C-1.

(ii) *Off-Site Emissions/CO "Hot Spots"*

Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near the 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 was conducted by the SCAQMD for its CO Attainment Demonstration Plan in the AQMP.<sup>137</sup> 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 compared to the SCAQMD modeled values in its AQMP.

(c) *Toxic Air Contaminants*

(i) *Construction*

The greatest potential for TAC emissions during construction would be related to DPM emissions associated with the operation of heavy-duty equipment during excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature (approximately 22 months). The SCAQMD has not adopted guidance requiring that quantitative health risk assessments (HRAs) be performed for short-term exposures to TAC emissions. The SCAQMD also has not

<sup>136</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

<sup>137</sup> South Coast Air Quality Management District, 2003 Air Quality Management Plan, Chapter 6 Clean Air Act Requirements, 2003, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-ch-6.pdf>. Accessed February 2020.

adopted guidance that establishes a methodology for performing HRAs or that requires Lead Agencies to use the 2015 OEHHA guidance manual when assessing short-term TAC exposures from construction emissions for CEQA analyses. Specifically, the SCAQMD states that “SCAQMD currently does not have guidance on construction Health Risk Assessments” and does not apply the 2015 OEHHA update to construction.<sup>138</sup> Furthermore, with respect to the 2015 OEHHA guidance, in comments presented to its Governing Board (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 revised OEHHA guidelines for projects subject to CEQA, SCAQMD staff reported that:<sup>139</sup>

*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. In the interim, staff will continue to use the previous guidelines for CEQA determinations.*

To date, the SCAQMD has not conducted public workshops nor developed policy relating to the applicability of applying the revised 2015 OEHHA guidance for projects prepared by other public/lead agencies subject to CEQA or for mixed-use residential and commercial projects, such as the proposed Project.

Therefore, given the lack of adopted guidance from the SCAQMD for assessing the potential impacts of a project’s short-term construction TAC emissions, the City does not require that the Project’s potential impacts be quantitatively assessed through the preparation of an HRA for purposes of CEQA compliance. Even so, however, for informational purposes and in light of the fact that the Project is an ELDP, a quantitative construction HRA has been prepared for the Project, and is included in Appendix C-1 of this Draft EIR.

<sup>138</sup> 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, p. 2-23, September 2016, [http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/final-ea\\_par-307-1\\_1401\\_1402.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/final-ea_par-307-1_1401_1402.pdf?sfvrsn=4). Accessed August 2019.

<sup>139</sup> South Coast Air Quality Management District, Board Meeting Date: June 5, 2015, Agenda No. 28, Proposed Amended Rules 1401 – New Source Review of Toxic Air Contaminants, 1401.1 – Requirements for New and Relocated Facilities Near Schools, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, and 212 – Standards for Approving Permits and Issuing Public Notice, 2015.

The construction HRA was performed through a dispersion modeling approach using the USEPA/AMS Regulatory Model (AERMOD). Consistent with SCAQMD recommendations for dispersion modeling, AERMOD was run using the urban dispersion modeling parameter.<sup>140</sup> Meteorological data from the SCAQMD's Central Los Angeles monitoring station within Source-Receptor Area (SRA) 1 was used to represent local weather conditions and prevailing winds data. The SCAQMD provides AERMOD-ready meteorological data files at this location for years 2010, 2011, 2014, 2015, and 2016. Terrain data from the U.S. Geological Survey was used to assign elevations to modeled emissions sources and modeled receptor locations. The emission sources were characterized as volume sources within AERMOD. Volume sources for the on-site heavy-duty construction equipment were placed throughout the entire Project Site boundary. Volume sources for the trucks were placed on the truck route within approximately 0.25-miles radius of the Project Site boundary. Cartesian grid receptor points were placed within AERMOD at sensitive receptor locations discussed above in consideration of the proximity of the sensitive receptors to the Project Site and their potential to result in maximum impacts for sensitive air quality receptors. The receptors points were spaced 5 meters apart, which is consistent with SCAQMD dispersion modeling recommendations.<sup>141</sup>

Construction TAC emissions were modeled based on emissions from the CalEEMod software, which reports DPM exhaust emissions from diesel-fueled construction equipment as PM10 and PM2.5, as DPM consists of PM10 and PM2.5. Documentation from CARB indicates that DPM exhaust consists of 92 percent PM2.5 and 100 percent PM10 (PM2.5 is a subset of PM10).<sup>142</sup> Therefore, for the purposes of this analysis, the PM10 construction exhaust emissions from CalEEMod and EMFAC2017 were used in this analysis.

As discussed previously, the SCAQMD does not require land use development projects to prepare quantitative construction HRAs and therefore has no guidance on the preparation of construction HRAs.<sup>143</sup> Thus, health risk calculations were used from available SCAQMD stationary source permitting guidance documents and stationary

<sup>140</sup> South Coast Air Quality Management District, Modeling Guidance for AERMOD, Urban Dispersion Option, <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>. Accessed March 2020.

<sup>141</sup> South Coast Air Quality Management District, Modeling Guidance for AERMOD, Urban Dispersion Option, <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>. Accessed March 2020.

<sup>142</sup> California Air Resources Board, Speciation Profiles Used in ARB Modeling, PMSIZE (Excel)-Particle size fraction data for source categories, PM Profile Number 425 (Diesel Vehicle Exhaust), <https://www.arb.ca.gov/ei/speciate/speciate.htm>. Accessed August 3, 2018.

<sup>143</sup> 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, [http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/final-ea\\_par-307-1\\_1401\\_1402.pdf?sfvrsn=4](http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2016/final-ea_par-307-1_1401_1402.pdf?sfvrsn=4). Accessed August 23, 2018.

source risk assessment procedures normally used to evaluate health risk impacts from long-term operations for stationary source facility permit projects in which the SCAQMD is the lead agency. While the SCAQMD is not the lead agency for this Project, the SCAQMD risk assessment procedures provide a uniform approach for evaluating health risks. Health risk calculations were performed using the 2003 OEHHA methodology<sup>144</sup> and associated SCAQMD exposure parameters.<sup>145</sup> As stated above, the SCAQMD has not adopted policies relating to the applicability of applying the revised 2015 OEHHA guidance for projects prepared by other public/lead agencies subject to CEQA or for mixed-use residential and commercial projects, such as the proposed Project. Thus, the 2003 OEHHA methodology continues to be used for CEQA determinations.<sup>146</sup>

#### (d) Operations

During long-term operations, TACs could be emitted as a result of periodic maintenance operations, period testing and maintenance of the emergency generator, restaurant charbroiling, cleaning, painting, etc., and periodic visits from delivery trucks and service vehicles. However, these activities are expected to be occasional and to result in minimal 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.<sup>147, 148</sup> Thus, a qualitative analysis is appropriate for assessing the Project's operational TAC 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.

### (5) Cumulative Impacts (Construction and Operations)

The City has determined to rely on thresholds established by the SCAQMD (refer to State CEQA Guidelines Section 15064.7 and Appendix G) to assess the Project's cumulative impacts. Since neither the City nor the SCAQMD has established numerical thresholds

<sup>144</sup> Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, August 2003, <https://oehha.ca.gov/media/downloads/cnr/hrafinalnoapp.pdf>. Accessed August 29, 2018.

<sup>145</sup> South Coast Air Quality Management District, Risk Assessment Procedures for Rules 1401 and 212, Appendix L, Version 7.0, revised June 5, 2012, <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/risk-assessment-procedures-v-7.pdf?sfvrsn=4>, <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/attachment-l.pdf?sfvrsn=4>. Accessed August 29, 2018.

<sup>146</sup> South Coast Air Quality Management District, Board Meeting Date: June 5, 2015, Agenda No. 28, Proposed Amended Rules 1401 – New Source Review of Toxic Air Contaminants, 1401.1 – Requirements for New and Relocated Facilities Near Schools, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, and 212 – Standards for Approving Permits and Issuing Public Notice, 2015.

<sup>147</sup> South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005, Table 2-3, <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>. Accessed August 2019.

<sup>148</sup> California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, 2005, Table 1-1, <https://ww3.arb.ca.gov/ch/landuse.htm>. Accessed August 2019.

applicable to the sum of multiple project emissions for comparison purposes and since the Project's regional emissions have the potential to affect the Air Basin as a whole, cumulative air quality impacts were evaluated consistent with accepted and established SCAQMD's recommended cumulative impact evaluation methodology.<sup>149</sup>

Additionally, as discussed above, the SCAQMD recommends assessing a project's potential cumulative impacts based on whether it is consistent with the AQMP. Thus, Project's cumulative air quality impacts were also evaluated based on its consistency with the SCAQMD's adopted 2016 AQMP.

### c) Project Design Features

The following Project design features (PDFs) are incorporated into the Project.

**PDF-AQ-1: Green Building Measures:** The Project will be designed and operated to exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.

Green building measures will include, but are not limited to the following:

- The Project will be designed to optimize energy performance and reduce building energy cost by a minimum of 5 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016).
- The Project will be designed to optimize energy performance and reduce building energy cost by installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent.
- The Project will provide a minimum of 30 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the Project Site.
- The Project will reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption as required in LAMC Section 99.04.304. Reductions would be achieved through drought-tolerant/California native plant species selection, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), and/or smart irrigation systems (e.g., weather-based controls).
- The Project will reduce indoor potable water use by a minimum of 20 percent compared to baseline or standard water consumption as defined in LAMC Section 99.04.303 by installing water fixtures that exceed applicable standards.
- The Project would not include fireplaces in the residential buildings.

<sup>149</sup> South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>. Accessed August 2019.

In addition, as discussed in Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR, Project Design Features will include:

**PDF GHG-1: GHG Emission Offsets:** The Project will provide or obtain GHG emission offsets as required in the Project's Environmental Leadership Development Project certification and related documentation pursuant to the *Jobs and Economic Improvement Through Environmental Leadership Act*.

**PDF GHG-2:** At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

**PDF GHG-3:** At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

## d) Analysis of Project Impacts

***Threshold (a): Would the project conflict with or obstruct implementation of the applicable air quality plan?***

### (1) Air Quality Management Plan Consistency

As discussed above, the SCAQMD has adopted a series of AQMPs to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. The 2016 AQMP relies on emissions forecasts based on the demographic and economic growth projections provided by SCAG's 2016 in devising its control strategies for reducing emissions of ozone and PM<sub>2.5</sub> to meet five NAAQS standards.<sup>150</sup> SCAG is charged by California law with preparing and approving "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and

<sup>150</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, p. ES-6, 3-1, 3-3, 3-10, 3-17. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

transportation programs, measures and strategies.”<sup>151</sup> The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, the lead agency assess whether the project would directly obstruct implementation of the AQMP by impeding the SCAQMD’s efforts to achieve attainment with respect to any criteria pollutant for which the Air Basin is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment and population/residential units) upon which the AQMP is based.<sup>152</sup> Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the AQMP and not to interfere with its attainment.<sup>153</sup>

The Project would not obstruct implementation of the 2016 AQMP for, as discussed below, its construction and operational emissions would not generate emissions that cause or result in localized ambient concentrations that exceed the NAAQS or CAAQS (refer to analysis in Threshold (c)). 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]) specified in the 2016 AQMP. As discussed under Methodology, 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 quality levels identified in the 2016 AQMP, even if their emissions exceed the SCAQMD’s thresholds of significance. The Project’s less than significant construction impacts would not conflict with the SCAQMD’s long-term plans to achieve the ambient air quality standards. In addition, as discussed below, the Project’s compliance with these measures and requirements would render it consistent with, and meet or exceed, the 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the Project’s criteria pollutant emissions would 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),<sup>154</sup> or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

The Project is also affirmatively consistent with the 2016 AQMP. The Project has incorporated into its design appropriate control strategies included in the 2016 AQMP for

<sup>151</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP), 2016, p. 4-42. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>. Accessed August 2019.

<sup>152</sup> South Coast Air Quality Management District, CEQA Air Quality Analysis Handbook (1993), 1993, p. 12-2, 12-3, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019

<sup>153</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993), 1993, p. 12-1, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed August 2019

<sup>154</sup> 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 South Coast Air Quality Management District, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

achieving its emission reduction goals, and the Project is also consistent with the demographic and economic assumptions upon which the AQMP is based.

(a) *Construction*

(i) *Control Strategies*

During its construction phase, the Project 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 other construction emissions. Furthermore, the Project would comply with fleet rules to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 (CARB Truck and Bus regulation)). Compliance with these requirements and incorporation of these controls cause the Project to meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

(ii) *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*

(i) *Control Strategies and Policy Consistency*

The Project's location, design and land uses also render it consistent with the 2016 AQMP during operations. As discussed above, the 2016 AQMP includes transportation control strategies from the 2016 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's 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 is considered an "infill" project, as it would replace existing residential uses with a high-density, mixed-use development. The Project proposes to increase density, consistent with compact growth, on a parcel of infill urban land accessible to and well served by public transit including frequent and comprehensive transit services. The Project's new housing and job growth, is focused in a high-quality transit area (HQTa), which SCAG defines as an area within a half mile of



a well-serviced transit stop.<sup>155</sup> The Project's urban location setting and its land use characteristics are analyzed below using the methodology used by CAPCOA in its guidance document entitled *Quantifying Greenhouse Gas Mitigation Measures*,<sup>156</sup> to demonstrate that the Project would result in reduced VMT, and reduced associated transportation-related air pollutant emissions, as compared to statewide and South Coast Air Basin averages. This analysis provides evidence of the Project's consistency with the 2016 AQMP's goal of reducing mobile source emissions as a source of NO<sub>x</sub> and PM<sub>2.5</sub>.

As discussed above, the Project has been designed to incorporate features to attract pedestrians and to promote non-motorized transportation modes such as walking and biking. Further, its land use characteristics (including Increased Density, Location Efficiency, Increased Land Use Diversity and Mixed-Uses, and Increased Transit Accessibility), discussed above, many of which overlap the strategies in the 2016 AQMP, have been shown by CAPCOA to reduce vehicle trips and VMT, and corresponding vehicle emissions; the Project's incorporation of these features into its design further demonstrates its consistency with the 2016 AQMP by reducing its vehicle trips, VMT and greenhouse gas (GHG) and other associated air pollutant emissions.

The California Air Pollution Control Officers Association (CAPCOA) has provided guidance on mitigating or reducing emissions from land use development projects. In September 2010, CAPCOA released a guidance document, entitled *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended reduction measures.<sup>157</sup> The CAPCOA guidance document was utilized in this analysis for quantifying reductions due to Project characteristics and Project Design Features in CalEEMod.

The Project's land use characteristics listed below are consistent with those shown in the CAPCOA guidance document to reduce vehicle trips to and from the Project Site as compared to statewide and Air Basin averages. They would, therefore result in corresponding reductions in VMT and associated air pollutant and GHG emissions. The reduction in VMT from these land use characteristics has been estimated in accordance with the CAPCOA methodologies and included in the emissions estimate for the Project's mobile sources.

- **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

<sup>155</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy, 2016, p. 8, <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

<sup>156</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

<sup>157</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

characteristic corresponds to CAPCOA guidance strategy LUT-1.<sup>158</sup> 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 Site is located in an urban/compact infill<sup>159</sup> location and the Project is a mixed-use development; therefore, this characteristic applies to the Project. The Project would increase the Project Site density to approximately 181 dwelling units per acre (210 dwelling units on 1.16 acres) and 85 jobs per acre (99 employees on 1.16 acres) (refer to Section IV.J, *Population, Housing, and Employment*, of this Draft EIR).

- **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 area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies.<sup>160</sup> This characteristic corresponds to CAPCOA guidance strategy LUT-2.<sup>161</sup> 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 Site is located in an urban/compact infill location and the Project is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic

<sup>158</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 155-158. <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

<sup>159</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 59-60. <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019. The Project Site 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). The Project Site 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 Hollywood Community Plan Draft EIR, Section 4.2, *Population, Housing, and Employment*, Table 4.2-2 shows that existing 2005 conditions and various projections to 2030 have a jobs/housing ratio ranging from 0.97 to 1.13). While the Project Site meets some of the characteristics for the urban setting and some of the characteristics for the compact infill setting, for the purposes of this analysis, the Project Site is assumed to be located in a compact infill setting. This is a highly conservative approach since the compact infill setting achieves lower VMT reductions than the urban setting. Thus, it is possible that the Project could achieve greater VMT reductions than are indicated in this assessment since the Project Site area meets some of the characteristics of the urban setting.

<sup>160</sup> CalEEMod, by default, assumes that trip distances in the Air Basin are slightly longer than the Statewide average 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 the SCAG 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The RTP/SCS shows that, even under future Plan conditions, upwards of 34 percent of all work trips are 15 miles or longer (SCAG, *Performance Measures Appendix*, p. 7, 2012). The RTP/SCS does not specify the current percentage of work trips greater than 15 miles in the region, but it can be assumed that the percentage is currently greater than 34 percent since the goal of the RTP/SCS is to reduce overall 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.

<sup>161</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 159-161, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

include the geographic location of a project within the region. The Project Site represents an urban/compact infill location within an identified Transit Priority Area within the Hollywood community of Los Angeles. The Project Site is served by existing public transportation located within a quarter-mile. The Project Site is within an active urban center with many existing off-site commercial and residential buildings. 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.

- 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 could be accommodated by alternative modes of transportation, such as public transit, bicycles, and walking. This characteristic corresponds to CAPCOA guidance strategy LUT-3.<sup>162</sup> 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 Site is located in an urban/compact infill location within an identified Transit Priority Area and the Project is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, 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 commercial and residential land uses in close to proximity to existing off-site commercial and residential uses. The Project would include on-site retail and residential land uses and would be located within a quarter-mile of off-site commercial and residential 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-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions (see the Project's VMT analysis in the CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California for additional information).<sup>163</sup>
- Increased Destination Accessibility:** This characteristic corresponds to CAPCOA guidance strategy LUT-4.<sup>164</sup> 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 Site is located in an urban/compact infill location within an identified Transit Priority Area and the Project is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, 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, studio/production, office, entertainment, movie theater, and residential uses. The

<sup>162</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 162-166, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

<sup>163</sup> Gibson Transportation Consulting, Inc., CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California. Provided in Appendix L-1 of this Draft EIR.

<sup>164</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 167-170, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

Project Site is also located near other job centers in the region, which include Downtown Los Angeles (easily accessible via the Metro Red Line station located within a quarter mile of the site), Beverly Hills, Century City, Westwood, and the Hollywood area itself. The access to multiple destinations in close proximity to the Project Site would encourage transit use, reduce vehicle trips and VMT compared to the Statewide and Air Basin averages, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

- 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 guidance strategy LUT-5.<sup>165</sup> 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 Site is located in an urban/compact infill location within an identified Transit Priority Area and the Project is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to transit stations near the Project Site. The Project would be located within one quarter-mile of public transportation, including existing Metro bus routes (e.g., 180/181, 217, 2/302, Dash Beachwood, Dash Hollywood) and the Metro Red Line, which provides convenient access to Downtown Los Angeles and connections to Koreatown, Hollywood and North Hollywood. The Project would provide access to on-site uses from existing pedestrian pathways. The Project would also provide parking for approximately 244 bicycles on-site to encourage utilization of alternative modes of transportation. The increased transit accessibility would reduce vehicle trips and VMT versus statewide and Air Basin averages, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.
- 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 guidance strategy SDT-1.<sup>166</sup> 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 Site is located in an urban/compact infill location within an identified Transit Priority Area and the Project is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, 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 2.0, Project Description, the

<sup>165</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 171-175, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

<sup>166</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 186-189, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019.

Project would improve the street-level pedestrian environment and connectivity to the surrounding Hollywood area, with pedestrian access to commercial/restaurant uses provided from various at-grade sidewalks and steps equipped with café tables, parkway planters, and bike parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. In summary, the Project would provide an internal pedestrian network for Project visitors and residents that links to the existing off-site pedestrian network, including existing off-site sidewalks, and would therefore result in a small reduction in VMT and associated transportation-related emissions.

Therefore, as discussed above, the Project has been located and designed to incorporate features to attract pedestrians and to promote non-motorized transportation modes such as walking and biking. Further, its land use characteristics (including Increased Density, Location Efficiency, Increased Land Use Diversity and Mixed-Uses, and Increased Transit Accessibility), discussed above, many of which overlap the strategies in the 2016 AQMP, have been shown by CAPCOA to reduce vehicle trips and VMT, and corresponding vehicle emissions; the Project's incorporation of these features further demonstrates its consistency with the 2016 AQMP by reducing vehicle trips, VMT and associated air pollutant emissions.

#### (ii) *Growth Projections*

The Project is anticipated to be operational as early as in 2022. As discussed in Section IV.J, *Population, Housing, and Employment*, of the Draft EIR, the Project-related population growth would be within the growth projections in SCAG's 2016 RTP/SCS and Citywide. Furthermore, Section IV.H, *Land Use and Planning*, of the Draft EIR provides an analysis of the Project's consistency with other applicable plans (i.e., General Plan) pertaining to development at the Project Site. The Project's growth is consistent with the 2016 RTP/SCS goals and objectives under SB 375 to implement "smart growth" and State efforts to meet goals in the reduction of GHG (see subsection IV.F, *Greenhouse Gas Emissions*, of this Draft EIR for more information).<sup>167</sup> The 2016 RTP/SCS seeks improved "mobility and accessibility... to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices."<sup>168</sup> The 2016 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."<sup>169</sup> The Project's proximity to public transit allows the Project's projected growth to be accommodated by the City's transportation resources and decreases the time and cost of traveling as well as vehicular demand and associated pollutants (see discussion under subsection IV.B.3.(d)(1)(b)(i), *Control Strategies and*

<sup>167</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 65, 195, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

<sup>168</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 160, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

<sup>169</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 14, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed August 2019.

*Policy Consistency*, of this Section). The Project would locate residential uses in proximity to job centers in Hollywood and Los Angeles. As such, the Project offers opportunities for people to live near their work and to have access to convenient modes of transportation that provides options for reducing their reliance on automobiles. The Project would therefore also be consistent with the growth projections as contained in the City's General Plan, and ultimately consistent with the growth projections in the AQMP, since the growth would occur in a Transit Priority Area resulting in highly transportation-efficient growth, which would minimize potential growth in transportation-related emissions. For all of these reasons, impacts would be less than significant.

## (2) 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. In addition, the first objective of the Air Quality Element is to reduce air pollutant emissions consistent with the AQMP. Goals of the Air Quality Element which are relevant to the Project are further documented in **Table IV.B-5, Comparison of the Project to Applicable Air Quality Policies of the General Plan**.

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
<b>Air Quality Element</b>	
<b>Goal 1:</b> Good air quality and mobility in an environment of continued population growth and healthy economic structure.	<b>No Conflict.</b> The Project would provide residential uses and employment opportunities in close proximity to job centers in Hollywood and Los Angeles. As such, people can live near their work, and have access to convenient modes of transportation that provide options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would incorporate Project design features that would meet and exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would also reduce VMT as a result of its urban infill location within an identified Transit Priority Area and HQT, with nearby access to public transportation within a quarter-mile of the Project Site, and its proximity to other destinations including job centers, retail and entertainment. The Project would also allow people to live near recreational amenities. As a result, the Project would provide people with convenient mobility options and a wide range of economic/employment opportunities.

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
<b>Objective 1.1:</b> 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.	<b>No Conflict.</b> The Project's land use characteristics and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold a), the Project would be consistent with the relevant SCAG growth projections and with the SCAG RTP/SCS projections that are used in preparing the AQMP. The Project would occupy a location within an identified Transit Priority Area/HQTA that is highly accessible by regional and local bus lines, including the Metro bus routes Metro 217 and 180/181, as well as the Metro Red Line subway which provides convenient access to Downtown Los Angeles. As such, the Project would be supportive of the Transportation Control Measures in the AQMP related to reducing vehicle trips for employees, visitors and residents. The Project would increase residential and commercial density near public transit, which would reduce the Project's transportation related emissions compared to a development that is not located near transit options.
<b>Objective 1.3:</b> It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	<b>No Conflict.</b> The Project would incorporate measures that would reduce particulate air pollutants from unpaved areas, parking lots, and construction sites. The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403. The Project would also comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks reducing exhaust diesel particulate matter emissions. The Project would require the use of a construction contractor(s) that complies with the applicable provisions of the CARB In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of diesel particulate matter filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. The Project would require the use of contractors and vendors that comply with the applicable provisions of the CARB Truck and Bus regulation to reduce PM and NO <sub>x</sub> emissions from existing diesel trucks. The Project would also implement Mitigation Measure MM-AQ-1 requiring the use of off-road construction equipment that meets the stringent Tier 4 Final emissions standards. The Project incorporates landscaped open spaces and trees.
<b>Policy 1.3.1:</b> Minimize particulate emissions from construction sites.	<b>No Conflict.</b> The Project would incorporate measures and comply with regulations that would reduce particulate air pollutants from construction activity as described above under Objective 1.3.

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
<p><b>Policy 1.3.2:</b> Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.</p>	<p><b>No Conflict.</b> The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions from unpaved roads and parking lots associated with construction-related vehicular traffic. See also description under Objective 1.3.</p>
<p><b>Goal 2:</b> Less reliance on single-occupant vehicles with fewer commute and non-work trips.</p>	<p><b>No Conflict.</b> The Project's location and land use characteristics would reduce trips and VMT due to its urban infill location within an identified Transit Priority Area/HQTA, with nearby access to public transportation within a quarter-mile of the Project Site and its location in an area with access to multiple other destinations, including job centers, and retail uses. In addition, the Project would include on-site residential, hotel, and commercial/restaurant land uses which would serve the local community and reduce its reliance on single-occupancy vehicles. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations.</p>
<p><b>Objective 2.1:</b> 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.</p>	<p><b>No Conflict.</b> The Project would be located within an identified Transit Priority Area/HQTA within a quarter-mile of existing public transportation, including existing Metro bus routes (e.g. 180/181, 217, and 2/302) and Metro Rail Red Line, that would provide access to multiple destinations. The Project would provide access to on-site uses from existing pedestrian pathways. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations. The Project would also provide bicycle parking facilities. These features would reduce work trips and encourage employees, residents and visitors to utilize alternative modes of transportation.</p>
<p><b>Policy 2.1.1:</b> Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle</p>	<p><b>No Conflict.</b> The Project would be located within a quarter-mile of existing public transportation, provide access to on-site uses from existing pedestrian pathways, and provide bicycle parking facilities. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the</p>



**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations. These features would reduce work trips and encourage employees to utilize alternative modes of transportation including public transportation, walking, bicycling and provide ability for residents to telecommunicate.
<b>Objective 2.2:</b> It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.	<b>No Conflict.</b> As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations, consistent with and exceeding the LA Green Building Code. In addition, the Project would encourage non-automotive transportation to and from the Project Site. As discussed previously, the Project would be located within an identified Transit Priority Area/HQTA within a quarter-mile of existing and potential future planned public transportation, including existing Metro bus routes (e.g. 180/181, 217, and 2/302) and would provide on-site bicycle parking facilities. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations. Furthermore, the Project would implement MM TRAF-1 that includes a comprehensive Transportation Demand Management (TDM) program (for additional details refer to Section IV.L, <i>Transportation</i> )
<b>Policy 2.2.1:</b> Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	<b>No Conflict.</b> The Project would be located within an identified Transit Priority Area/HQTA within a quarter-mile of existing public transportation, including existing Metro bus routes (e.g. 180/181, 217, and 2/302) and would provide on-site bicycle parking facilities. The Project would implement PDF GHG-2 and PDF GHG-3 where a minimum of eight (8) percent of on-site parking would be designated for carpool and/or alternative-fueled vehicles that would encourage multi-

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
<p><b>Policy 2.2.2:</b> Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.</p>	<p>occupant vehicle use. Furthermore, the Project would implement MM TRAF-1 that includes a comprehensive Transportation Demand Management (TDM) program (for additional details refer to Section IV.L, <i>Transportation</i>).</p> <p><b>No Conflict.</b> The Project would provide preferential parking for carpool and electric/hybrid vehicles. The Project would implement PDF GHG-2 and PDF GHG-3 where a minimum of eight (8) percent of on-site parking would be designated for carpool and/or alternative-fueled vehicles that would encourage multi-occupant vehicle use.</p>
<p><b>Goal 4:</b> Minimize impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.</p>	<p><b>No Conflict.</b> The Project's characteristics would reduce trips and VMT due to its urban infill location within an identified Transit Priority Area, on-site amenities and commercial/restaurant uses, access to public transportation within a quarter-mile of the Project Site, and close proximity to multiple other destinations including job centers and retail uses. The Project would increase the job density relative to the Statewide and South Coast Air Basin averages and increase the residential density near public transportation options, which would allow people to live near places of employment, retail, and recreation. As discussed above, the Project is consistent with the AQMP and the 2016 RTP/SCS.</p>
<p><b>Objective 4.1:</b> It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.</p>	<p><b>No Conflict.</b> The Project analysis of potential air quality impacts relies upon the thresholds of significance established by the SCAQMD, which considers attainment of the ambient air quality standards. The Project also incorporates Project land use characteristics that would reduce land use planning-related air pollutant emissions consistent with recommended strategies from the CAPCOA (see subsection IV.B.3.d)(1)(b)(i) of this Section and Section IV.F, <i>Greenhouse Gas Emissions</i>, of this Draft EIR, for additional information regarding the CAPCOA recommended strategies). The Project would occupy an urban infill location within an identified Transit Priority Area/HQTA in the Hollywood area. The Project would co-locate complementary residential and commercial land uses in proximity to existing job centers and retail uses. The Project would be located within a quarter-mile of existing public transportation. Air quality impacts would be less than significant and would not cause or contribute to an exceedance of the ambient air quality standards. As discussed above, the Project is consistent with the AQMP.</p>
<p><b>Policy 4.1.2:</b> Ensure that project level review and approval of land use development remain at the local level.</p>	<p><b>No Conflict.</b> The Project environmental review and approval would occur at the local level.</p>

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
<p><b>Objective 4.2:</b> It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.</p>	<p><b>No Conflict.</b> The Project's location and land use characteristics would reduce trips and VMT due to its urban infill location within an identified Transit Priority Area/HQTA, access to public transportation within a quarter-mile of the Project Site, and proximity to employment and retail destinations. The Project would include on-site retail, restaurant, and residential land uses that would serve the local community and would be located within a quarter-mile of off-site commercial and residential uses. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations. Furthermore, the Project would implement MM TRAF-1 that includes a comprehensive Transportation Demand Management (TDM) program (for additional details refer to Section IV.L, <i>Transportation</i>). The Project would also provide bicycle parking facilities to encourage utilization of alternative modes of transportation. See the discussion of Project characteristics, above.</p>
<p><b>Policy 4.2.2:</b> Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.</p>	<p><b>No Conflict.</b> The Project would provide residential, hotel, and commercial/restaurant uses in a compact urban infill location. The Project would add new residents as well as employment opportunities that are accessible via public and alternative forms of transportation including bicycling. The Project would occupy an urban infill location within an identified Transit Priority Area/HQTA with access to employment centers, shopping centers, and other establishments in Downtown Los Angeles, Hollywood and other areas within a quarter-mile of the Project Site. The Project would be located within a quarter-mile to public transportation, of off-site commercial and residential uses. The Project would also provide bicycle parking facilities to encourage utilization of alternative modes of transportation.</p>
<p><b>Policy 4.2.3:</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>	<p><b>No Conflict.</b> The Project would provide bicycle parking facilities to encourage utilization of alternative modes of transportation. The Project would also provide access to on-site uses from existing pedestrian pathways. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and</p>

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
<p><b>Policy 4.2.4:</b> Require that air quality impacts be a consideration in the review and approval of all discretionary projects.</p>	<p>panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations.</p> <p><b>No Conflict.</b> The Project environmental review and potential approval include an analysis of air quality impacts.</p>
<p><b>Policy 4.2.5:</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.</p>	<p><b>No Conflict.</b> The Project incorporates characteristics that would reduce VMT and trips, encourage alternative modes of transportation, and incorporate congestion management. The Project would occupy an urban infill location within an identified Transit Priority Area/HQTA within a quarter-mile of existing public transportation and would provide bicycle parking facilities to encourage alternative modes of transportation. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations. Furthermore, the Project would implement MM TRAF-1 that includes a comprehensive Transportation Demand Management (TDM) program (for additional details refer to Section IV.L, <i>Transportation</i>). The Project would also provide bicycle parking facilities to encourage utilization of alternative modes of transportation.</p>
<p><b>Goal 5:</b> 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.</p>	<p><b>No Conflict.</b> The Project would 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. The Project would incorporate sustainability measures and performance standards including implementing a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029, optimize energy performance and reduce building energy cost by 5 percent, and reducing indoor water use by a minimum of 20 percent. As described in PDF GHG-2 and PDF GHG-3, the Project would encourage carpooling and the use of electric vehicles by designating a minimum of eight (8) percent of the Project's on-site commercial parking for carpool and/or alternative-fueled vehicles, and the Project will pre-wire and install conduit and panel capacity for electric vehicle charging stations for a</p>

**TABLE IV.B-5**  
**COMPARISON OF THE PROJECT TO APPLICABLE AIR QUALITY POLICIES OF THE**  
**GENERAL PLAN**

Recommendation	Would the Project Conflict?
	<p>minimum of twenty (20) percent of the on-site parking spaces, with five (5) percent of the on-site parking spaces equipped with charging stations. Furthermore, the Project would implement MM TRAF-1 that includes a comprehensive Transportation Demand Management (TDM) program (for additional details refer to Section IV.L, <i>Transportation</i>). The Project would also provide bicycle parking facilities to encourage utilization of alternative modes of transportation.</p>
<p><b>Objective 5.1:</b> It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.</p>	<p><b>No Conflict.</b> As discussed above, the Project would 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.</p>
<p><b>Policy 5.1.2:</b> Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.</p>	<p><b>No Conflict.</b> As discussed above, the Project would 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.</p>
<p><b>Policy 5.1.4:</b> Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.</p>	<p><b>No Conflict.</b> The Project would implement a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. The Project would also provide space for the collection and storage of recyclables such as paper, cardboard, glass, plastic, and metals.</p>
<p><b>Objective 5.3:</b> It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources.</p>	<p><b>No Conflict.</b> As discussed above, the Project would 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.</p>
<p><b>Policy 5.3.1:</b> Support the development and use of equipment powered by electric or low-emitting fuels.</p>	<p><b>No Conflict.</b> As discussed above, the Project would 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.</p>

SOURCE: ESA, 2019.

Therefore, as shown by the evidence presented in Table IV.B-5, the Project would not conflict with or be inconsistent with applicable air quality policies in the Air Quality Element of the General Plan.

### (3) Conclusion

In conclusion, the analysis under Threshold (a) assessed the Project's consistency with the 2016 AQMP as well as applicable policies in the Air Quality Element of the City of Los Angeles. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality 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. In addition, as demonstrated by the discussion above, the Project has incorporated appropriate control strategies and would be consistent with the growth projections in the 2016 AQMP. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP land use policies. **Thus, the Project would not conflict with or obstruct implementation of the AQMP. Finally, as discussed above, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality. Based on the above, the Project's impacts under Threshold (a) would be less than significant, and no mitigation is required.**

***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?***

For the reasons explained above, the City has determined to rely on thresholds established by the SCAQMD (refer to State CEQA Guidelines Section 15064.7 and Appendix G) to assess the Project's cumulative impacts. Consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project's regional emissions to result in cumulative regional emission impacts is assessed based on the SCAQMD thresholds using the SCAQMD's recommended methodology. Because the Project's cumulative impacts are assessed based on its Project level impacts, the Project's Project level impacts must be first assessed as provided below.

### (1) Regional Construction Emissions

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts at the Project Site, through vehicle trips generated by workers and materials and haul trucks traveling to and from the Project Site, and through building activities at the Project Site 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<sub>x</sub>, would result from the use of construction equipment such as dozers and loaders, and from construction traffic. 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.

The maximum daily construction emissions for the Project were estimated for each construction phase. Some individual construction phases could potentially overlap; therefore, the estimated maximum daily emissions include these potential overlaps by combining the relevant construction phase emissions. As discussed above, 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 discussed previously, the Project Site is currently developed with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings (43 existing multi-family/apartment units total) and associated carports and paved surface parking areas, for a total of 44 dwelling units, all of which would be demolished and removed from the site. These existing uses would be demolished and removed to allow for development of the Project. Detailed emissions calculations are provided in Appendix C-1 of this Draft EIR.

The results of the criteria pollutant calculations are presented in **Table IV.B-6, Estimated Unmitigated Maximum Regional Construction Emissions**. The calculations in Table IV.B-6 incorporate compliance with applicable dust control measures required to be implemented during each phase of construction by SCAQMD Rule 403 (Control of Fugitive Dust). As shown in Table IV.B-6, NO<sub>x</sub> emissions would exceed the SCAQMD threshold of significance and result in a potentially significant impact; however, impacts would be reduced to less than significant with implementation of Mitigation Measure MM-AQ-1.

**TABLE IV.B-6**  
**ESTIMATED UNMITIGATED MAXIMUM REGIONAL**  
**CONSTRUCTION EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

<b>Regional Emissions</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM10 <sup>b</sup></b>	<b>PM2.5 <sup>b</sup></b>
Demolition	5	59	24	<1	5	3
Site Preparation	4	44	22	<1	5	3
Grading/Excavation	7	112	41	<1	10	5
Building Construction	4	24	29	<1	5	2
Building Construction + Arch. Coating + Paving	33	38	45	<1	6	3
Paving	2	16	16	<1	1	1
<b>Maximum Regional Emissions</b>	<b>33</b>	<b>112</b>	<b>45</b>	<b>&lt;1</b>	<b>10</b>	<b>5</b>
<b>SCAQMD Thresholds of Significance</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Over (Under)	(42)	<b>12</b>	(505)	(150)	(140)	(50)
Exceeds Threshold?	No	<b>Yes</b>	No	No	No	No

<sup>a</sup> Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are provided in Appendix C-1.

<sup>b</sup> PM10 and PM2.5 emissions estimates assume compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

SOURCE: ESA, 2020

Mitigation Measure MM-AQ-1 requires the Project to utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Implementation of MM-AQ-1 would reduce emissions of VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> (refer to emissions modeling data provided in Appendix C-1).

Emissions of SO<sub>x</sub> would be unchanged with incorporation of the Tier 4 Final off-road emissions standards for the construction equipment. Emissions of CO would increase due to the engine technology involved in reducing NO<sub>x</sub> emissions; however, even at that level, CO emissions would still be below the significance threshold.

The results of the criteria pollutant calculations with Mitigation Measure MM-AQ-1 are presented in **Table IV.B-7, *Estimated Mitigated Maximum Regional Construction Emissions***. The level of emissions reductions from implementation of MM-AQ-1 is consistent with the overall stringency of the Tier 4 Final emissions standards. For example, NO<sub>x</sub> emissions from construction equipment are reduced by approximately 41 to 95 percent as compared to equipment meeting the less stringent Tier 2 off-road emissions standards, depending on the specific horsepower rating of each piece of equipment.<sup>170</sup> Similarly, implementation of Mitigation Measure MM-AQ-1 results in the reduction of DPM emissions from the Project's construction equipment by 81 to 96 percent as compared to equipment meeting the less stringent Tier 2 off-road emissions standards, depending on the specific horsepower rating of each piece of equipment.<sup>171</sup> The use of Tier 4 Final-compliant equipment is a Statewide standard recommended by SCAQMD and CARB, and will soon be required of nearly all construction projects in the State. The emissions reductions achieved by the Tier 4 Final equipment have been scientifically documented by CARB and included in the Final Regulation Order for Tier 4 Off-Road Compression Engines,<sup>172</sup> which are reflected in this analysis. The Tier 4 Final standard exceeds the State's fleet-wide BACT standard, as it takes into account the use of other higher emission engines within fleets.<sup>173</sup>

<sup>170</sup> California Air Pollution Control Officers Association, California Emissions Estimator Model Appendix: Appendix D: Default Data Tables, September 2016, p. D- 77, [http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05\\_appendix-d2016-3-1.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05_appendix-d2016-3-1.pdf?sfvrsn=2). Accessed August 2019.

<sup>171</sup> California Air Pollution Control Officers Association, California Emissions Estimator Model Appendix: Appendix D: Default Data Tables, September 2016, p. D- 77, [http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05\\_appendix-d2016-3-1.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05_appendix-d2016-3-1.pdf?sfvrsn=2). Accessed August 2019.

<sup>172</sup> California Air Resources Board, Final Regulation Order, Tier 4 Off-Road Compression-Ignition Engines, <https://ww3.arb.ca.gov/regact/2011/soreci2011/soreci2011part5.pdf>. Accessed February 2020.

<sup>173</sup> California Air Resources Board, Frequently Asked Questions, In-Use Off-Road Diesel Vehicle Regulation, 2014, <https://ww3.arb.ca.gov/msprog/ordiesel/faq/tierlifefaq.pdf>. Accessed February 2020.



**TABLE IV.B-7  
ESTIMATED MITIGATED MAXIMUM REGIONAL  
CONSTRUCTION EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

<b>Regional Emissions</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM10 <sup>b</sup></b>	<b>PM2.5 <sup>b</sup></b>
Demolition	2	25	24	<1	3	1
Site Preparation	1	2	20	<1	2	1
Grading/Excavation	4	70	43	<1	8	4
Building Construction	2	9	29	<1	4	1
Building Construction + Arch. Coating + Paving	30	10	48	<1	5	1
Paving	<1	1	18	<1	<1	<1
<b>Maximum Regional Emissions</b>	<b>30</b>	<b>70</b>	<b>48</b>	<b>&lt;1</b>	<b>8</b>	<b>4</b>
<b>SCAQMD Thresholds of Significance</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Over (Under)	(45)	(30)	(502)	(150)	(142)	(51)
Exceeds Threshold?	No	No	No	No	No	No

<sup>a</sup> Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are provided in Appendix C-1.

<sup>b</sup> PM10 and PM2.5 emissions estimates assume compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

SOURCE: ESA, 2020

As shown in Table IV.B-6 and Table IV.B-7, the Project's unmitigated construction daily emissions of NO<sub>x</sub> would exceed the SCAQMD threshold of significance and result in a potentially significant impact; however, impacts would be reduced to less than significant with implementation of Mitigation Measure MM-AQ-1. Therefore, with mitigation, the Project's potential regional criteria pollutant construction emissions would not 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.

Localized construction emissions from the Project would also be less than significant as discussed in detail under Threshold (c) below.

## (2) Regional Operational Emissions

Mobile, stationary, and area source criteria pollutant emissions during Project operations were calculated for the Project's full buildout year. Operational impacts in future years would be less than those analyzed due to a cleaner, less-polluting operational vehicle

fleet mix, pursuant to State regulations that require the vehicle fleet to phase-in less polluting vehicles. Operational emission estimates assume compliance with PDF-AQ-1, which includes increased energy efficiency features. Reductions in building energy and resource consumption due to physical and operational Project characteristics for which sufficient data is 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 Title 24-2016 standard. Operational emissions estimates also assume compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Detailed emissions calculations are provided in Appendix C-1 of this Draft EIR.

As discussed above in Methodology, daily VMT for the Project were taken from the Project's VMT analysis in the CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California<sup>174</sup> and include trips associated with the proposed multi-family residences, hotel, retail space, and restaurants. The VMT reflect reductions attributable to the Project's land use 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 Project's criteria pollutant emissions during operations are shown in **Table IV.B-8, *Estimated Maximum Regional Operational Emissions***. The maximum daily emissions from operation of the Project are compared to the SCAQMD daily regional thresholds of significance. **As reported in Table IV.B-8, the Project's operational daily emissions for the criteria and precursor pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) would not exceed the SCAQMD thresholds of significance. Therefore, the Project's potential regional criteria pollutant operational emissions would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant and no mitigation is required.**

Localized operational emissions from the Project would be less than significant and are discussed in greater detail under Threshold (c) below.

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<sup>174</sup> Gibson Transportation Consulting, Inc., CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California. Provided in Appendix L-1 of this Draft EIR.

**TABLE IV.B-8**  
**ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Project</b>						
Area (Coating, Consumer Products, Landscaping)	9	4	19	<1	<1	<1
Energy (Natural Gas)	<1	2	1	<1	<1	<1
Stationary (Charbroiling)	<1	—	—	—	1	<1
Stationary (Emergency Generator)	<1	3	3	<1	<1	<1
Mobile	4	9	38	<1	10	3
<b>Total Regional Emissions</b>	<b>13</b>	<b>17</b>	<b>61</b>	<b>&lt;1</b>	<b>11</b>	<b>4</b>
<b>SCAQMD Thresholds of Significance</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Over/(Under)	(42)	(38)	(489)	(150)	(139)	(51)
Exceeds Thresholds?	No	No	No	No	No	No

<sup>a</sup> Emission quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are provided in Appendix C-1.

SOURCE: ESA, 2019

***Threshold (c): Would the project expose sensitive receptors to substantial pollutant concentrations?***

**(1) Localized Construction Emissions**

**(a) On-Site Construction Activities – Criteria Pollutants**

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD *Final Localized Significance Threshold Methodology* (June 2003, revised July 2008).<sup>175</sup> The screening criteria provided in the *Final Localized Significance Threshold Methodology* were used to determine the localized construction emissions thresholds for the Project. The maximum daily localized emissions for each of the construction phases and localized significance thresholds are presented in **Table IV.B-9, Estimated Maximum Localized Construction Emissions**.

<sup>175</sup> South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

**TABLE IV.B-9**  
**ESTIMATED MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

<b>Source</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM10<sup>b</sup></b>	<b>PM2.5<sup>b</sup></b>
Demolition	36	19	3.2	2.0
Site Preparation	43	21	4.5	3.2
Grading/Excavation	44	27	4.1	2.8
Building Construction	16	12	1.0	0.9
Building Construction + Arch. Coating + Paving	30	27	1.8	1.6
Paving	15	15	0.9	0.8
<b>Maximum Localized (On-Site) Emissions</b>	<b>44</b>	<b>27</b>	<b>4.5</b>	<b>3.2</b>
<b>SCAQMD Thresholds of Significance <sup>c</sup></b>	<b>79</b>	<b>739</b>	<b>5.5</b>	<b>3.3</b>
Over (Under)	(35)	(712)	(1.0)	(0.1)
<b>Exceed Threshold?</b>	No	No	No	No

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C-1.

<sup>b</sup> Emissions assume fugitive dust control measures consistent with SCAQMD Rule 403.

<sup>c</sup> The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles) for a 1.16-acre site within a 25-meter receptor distance.

SOURCE: ESA, 2020

The localized emissions calculations in Table IV.B-9 incorporate the same phasing and equipment assumptions and compliance with SCAQMD Rule 403 as discussed for the regional emissions calculations discussed above and shown previously in Table IV.B-6. As shown in Table IV.B-9, the Project's maximum localized construction emissions would not exceed the localized thresholds for CO, NO<sub>x</sub>, PM10, and PM2.5. Therefore, the Project's localized construction emission, impacts on sensitive receptors would be less than significant and no mitigation is required.

#### *(b) Construction Activities – TAC Emissions*

Temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase of the Project. According to the 2003 OEHA guidance manual, health effects from TACs for sensitive residential receptors are described in terms of individual cancer risk based on a long-term resident exposure (i.e., 30 years) or a lifetime (i.e., 70-year) exposure duration.<sup>176</sup> Given the temporary and short-term construction schedule (22 months), and because the construction schedule estimates that the phases that require the most heavy-duty diesel vehicle usage, such as site grading/excavation, would last for a much shorter duration (e.g., approximately five months), the Project would not result in a long-term resident

<sup>176</sup> California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Guidance Manual for Preparation of Health Risk Assessments, 2003, <https://oehha.ca.gov/media/downloads/cnr/hrfinalnoapp.pdf>. Accessed August 2019.

exposure or lifetime exposure to TAC emissions associated with DPM emissions as a result of Project construction.

Moreover, during construction, 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 also comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these requirements and strategies would minimize emissions of TACs during Project construction. In addition, there would be no residual emissions or corresponding individual cancer risk after construction.

As discussed in subsection IV.B.3.b)(5), *Methodology – Toxic Air Contaminant Impacts*, while a quantified HRA is not required to be conducted, for informational purposes and in light of the fact that the Project is an ELDP, a quantitative construction HRA was prepared to evaluate the Project's potential to result in health risk impacts. The findings show that the Project would result in an unmitigated cancer risk of approximately 10.4 in one million and a mitigated cancer risk of approximately 0.47 with implementation of mitigation measure MM-AQ-1, which is below the 10 in one million threshold of significance for the maximum impacted air quality sensitive receptors. and The unmitigated non-cancer chronic hazard index would be approximately 0.46, which is below the 1.0 threshold of significance for the maximum impacted air quality sensitive receptors.

The results of this AERMOD dispersion modeling are summarized in **Table IV.B-10, Estimated Maximum Construction Health Risk Impacts** and shows that TAC emissions from construction activities would not expose sensitive receptors to substantial TAC concentrations with implementation of Mitigation Measure MM-AQ-1.

**TABLE IV.B-10**  
**ESTIMATED MAXIMUM CONSTRUCTION HEALTH RISK IMPACTS <sup>a</sup>**

Air Quality Sensitive Receptor	Maximum Cancer Risk (in one million)		Maximum Non-Cancer Chronic Hazard Index	
	Unmitigated	Mitigated	Unmitigated	Mitigated
Maximum Exposed Individual	10.4	0.47	0.46	0.02
<b>SCAQMD Thresholds of Significance</b>	<b>10</b>	<b>10</b>	<b>1.0</b>	<b>1.0</b>
<b>Exceed Threshold?</b>	Yes	No	No	No

<sup>a</sup> Detailed calculations are provided in Appendix C-1.

SOURCE: ESA, 2020.

**Based on the analysis above, the qualitative assessment as well as the health risk modeling provides substantial evidence that TAC emissions from construction activities would not expose sensitive receptors to substantial TAC**

concentrations.<sup>177</sup> Thus, although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations.

## (2) Localized Operational Emissions

### (a) On-Site Operational Activities– Criteria Pollutants

As explained above, the localized operational air quality analysis was conducted using the methodology described in the SCAQMD *Final Localized Significance Threshold Methodology* (June 2003, revised July 2008).<sup>178</sup> The screening criteria provided in the *Final Localized Significance Threshold Methodology* were used to determine the localized operational emissions thresholds for the Project. The same assumptions, including the Project's incorporation of PDF-AQ-1, were used in the analysis as were used for the operational regional emissions calculations. The maximum daily localized emissions and localized significance thresholds are presented in **Table IV.B-11, Estimated Maximum Localized Operational Emissions**.

**TABLE IV.B-11**  
**ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10	PM2.5
<b>Project</b>						
Area (Coating, Consumer Products, Landscaping)	9	4	19	<1	0.4	0.4
Energy (Natural Gas)	<1	2	1	<1	0.1	0.1
Stationary (Charbroiling)	<1	—	—	—	0.6	0.4
Stationary (Emergency Generator)	<1	<1	3	<1	<0.1	<0.1
<b>Total Localized (On-Site) Emissions</b>	<b>9</b>	<b>8</b>	<b>23</b>	<b>&lt;1</b>	<b>1.1</b>	<b>0.9</b>
<b>SCAQMD Thresholds of Significance</b>	<b>—</b>	<b>79</b>	<b>739</b>	<b>—</b>	<b>2.0</b>	<b>1.2</b>
Over/(Under)	—	(71)	(716)	—	(0.9)	(0.3)
Exceeds Thresholds?	—	No	No	—	No	No

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C-1.

<sup>b</sup> The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles) for a 1.16-acre site within a 25-meter receptor distance.

SOURCE: ESA, 2019

<sup>177</sup> CAPCOA, California Emissions Estimator Model Appendix: Appendix D: Default Data Tables, September 2016, p. D-77

<sup>178</sup> South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed August 2019.

**As shown therein, the Project's maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub> or PM<sub>2.5</sub>. Therefore, the Project's localized operational emission, impacts on sensitive receptors would be less than significant and no mitigation is required.**

*(b) Operational Activities – TAC Emissions*

Project operations would result in only minimal emissions of air toxics from maintenance and other ongoing activities, such as from the use 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. Restaurant charbroiling has the potential to generate small amounts of chemicals that are known or suspected by the State of California to cause human health impacts<sup>179</sup> However, all restaurants incorporating charbroiling in the Air Basin must comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers. The emissions controls would reduce the already small amounts of emissions associated with charbroiling (as seen in Table IV.B-11) by approximately 83 percent,<sup>180</sup> such that charbroiling would not cause or contribute to adverse health impacts at nearby sensitive receptors. The Project's emergency generator 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 emergency generators and similar equipment. In compliance with Rule 1470, emissions from maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year. As shown in Table IV.B-11, PM<sub>10</sub> and PM<sub>2.5</sub> emissions (i.e., diesel particulate matter emissions) from the emergency generator would be less than 0.1 pounds per day for only those periodic days in which maintenance and testing occurs. Compliance with Rule 1470 and the Tier 4 Final standards would ensure the TAC emissions from the emergency generator would not cause or contribute to adverse health impacts at nearby sensitive receptors.

With respect to the use of consumer products and architectural coatings, the residential and retail uses associated with the Project would be expected to generate minimal emissions from these sources, as shown in Table IV.B-11. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products.

Project operations would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks must comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NO<sub>x</sub>

<sup>179</sup> U.S. Environmental Protection Agency, Polycyclic Aromatic Hydrocarbons (PAHs), January 2008, [https://www.epa.gov/sites/production/files/2014-03/documents/pahs\\_factsheet\\_cdc\\_2013.pdf](https://www.epa.gov/sites/production/files/2014-03/documents/pahs_factsheet_cdc_2013.pdf) Accessed August 2019.

<sup>180</sup> United States Environmental Protection Agency, Methods for Developing a National Emission Inventory for Commercial Cooking Processes: Technical Memorandum, 2003, <https://www3.epa.gov/ttn/chief/conference/ei13/pointarea/roe.pdf>. Accessed August 2019.

emissions from existing diesel trucks. Therefore, the Project operations would not be considered a substantial source of DPM emissions.

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 Project 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.**

As discussed previously, the Project's compatibility with existing, off-site sources of freeway TAC emissions is evaluated in Section IV.H, *Land Use and Planning*, of this Draft EIR. As discussed therein and as shown in Table IV.H-7 and Table IV.H-8 in Section IV.H, *Land Use and Planning*, the Project Site's maximally exposed residence would not be exposed to cancer risk in excess of the SCAQMD significance threshold of 10 per one million or non-cancer chronic impacts hazard index in excess of the SCAQMD significance threshold of 1.0. Since the Project Site is located within 1,000 feet of a freeway, in compliance with LAMC subsections 99.05.504.5.3 and 99.04.504.6, mechanical ventilation systems for regularly occupied areas of Project buildings would be equipped with air filtration media for outside and return air that meet or exceed the ASHRAE Standard 52.2 MERV 13 rating, which would minimize health risk impacts from freeway TAC emissions. Refer to Section IV.H, *Land Use and Planning*, for additional details regarding the analysis and the City's air filtration requirements.

#### (c) Off-Site Operational CO "Hot Spots" Analysis Activities

As shown previously in Table IV.B-3, CO levels in the Project Site area are substantially below the federal and state standards. Maximum CO levels in recent years are 2.0 ppm (one-hour average) and 1.7 ppm (eight-hour average) compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average). Carbon monoxide decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Air Basin for some time, and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at intersections analyzed in the Project Traffic Study<sup>181</sup> would rise to the level of an exceedance of these standards.

Additionally, the SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin, including: (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.<sup>182</sup> In the 2003 AQMP

<sup>181</sup> Gibson Transportation Consulting, Inc., Traffic Study for the 6220 Yucca Street Mixed-Use Project, Hollywood, California, 2018. Provided in Appendix L-2 of this Draft EIR

<sup>182</sup> South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, 2003, V-4-24, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp>. Accessed August 2019.



CO attainment demonstration, the SCAQMD noted 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.<sup>183</sup> 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 at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.<sup>184</sup> When added to the existing background CO concentrations, the screening values would be 6.6 ppm (one-hour average) and 4.9 ppm (eight-hour average). Relevant information from the 2003 AQMP CO attainment demonstration relied upon in this assessment is provided in Appendix C-1 of this Draft EIR.

Based on the Project Traffic Study, under future operational year 2022 plus Project conditions, the intersection of Vine Street and Sunset Boulevard would potentially have peak traffic volumes of approximately 70,520 per day, which are assumed to operate at very low or idling speeds at a congested roadway intersection.<sup>185</sup> As a result, CO concentrations are expected to be about 5.2 ppm (one-hour average) and 4.0 ppm (eight-hour average), which would not exceed the thresholds.<sup>186</sup> Total traffic volumes at the maximum 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.<sup>187</sup> **This comparison demonstrates that the Project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.**

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

As discussed in Chapter VI (subsection entitled Effects Found not to be Significant) of this Draft EIR and in the Initial Study (Appendix A of this Draft EIR), the Project would not

<sup>183</sup> South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, 2003, V-4-24, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp>. Accessed August 2019.

<sup>184</sup> The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

<sup>185</sup> Gibson Transportation Consulting, Inc., Traffic Study for the 6220 Yucca Street Mixed-Use Project, Hollywood, California, 2018, provided in Appendix L-2 of this Draft EIR. The traffic volume of approximately 70,520 was estimated based on the peak hour intersection volumes under future with Project conditions and the general assumption that peak hour trips represent approximately 10 percent of daily trip volumes. The peak value was estimated at the intersection of Vine Street and Sunset Boulevard.

<sup>186</sup> The expected CO concentrations are calculated based on the ratio of 70,520/100,000 multiplied by the screening values of 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) and adding the background concentrations. Actual CO value would likely be less than the expected values reported in the analysis as the average CO emissions from motor vehicles operating today have declined as compared to motor vehicles operating in year 2003.

<sup>187</sup> South Coast Air Quality Management District, 2003 Air Quality Management Plan, Chapter 6 Clean Air Act Requirements, 2003, <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp>. Accessed August 2019.

contain uses that would create objectionable odors affecting a substantial number of people; therefore, a less than significant impact would occur with respect to Threshold (d). No further analysis is required.

## **e) Cumulative Impacts**

For the reasons explained with respect to Threshold (b), above, the City has determined to rely on thresholds established by the SCAQMD (refer to State CEQA Guidelines Section 15064.7 and Appendix G) to assess the Project's cumulative impacts. While it may theoretically be possible to add emissions from the list of related projects together with the Project's emissions, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD has established numerical thresholds applicable to the sum of multiple project emissions for comparison purposes. Additionally, a Project's regional emissions have the potential to affect the Air Basin as a whole, and unlike other environmental issue areas, such as aesthetics or noise, it is not possible to establish a geographical radius around a specific project site within which potential cumulative impacts from regional emissions would be contained. 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's emissions to result in cumulative air quality impacts is assessed based on the SCAQMD thresholds using the SCAQMD's recommended methodology.

### **(1) Project-Specific Impacts**

The Project would result in the emission of criteria pollutants for which the region is in non-attainment during both construction and operation. Based on the project-level emissions reported above, the Project's cumulative impacts would be less than significant. For construction, the Project's maximum daily regional and localized emissions for the criteria pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) would not exceed the SCAQMD thresholds of significance as shown in Table IV.B-6. NO<sub>x</sub> emissions would be potentially significant; however, with implementation of mitigation measure MM-AQ-1, as shown in Table IV.B-7, impacts would be reduced to less than significant. Localized emissions from construction would be below the localized significance thresholds without mitigation as shown in Table IV.B-9. Therefore, cumulative impacts related to construction emissions would be mitigated to less than significant.

Regional and localized emissions from operations would be below the regional and localized thresholds of significance as shown in Table IV.B-8 and Table IV.B-11 and, therefore, cumulative impacts related to operational emissions would be less than significant.

With respect to TAC emissions, the qualitative assessment as well as the health risk modeling concluded that TAC emissions from construction activities would not expose sensitive receptors to substantial TAC concentrations. Thus, although the health risk modeling analysis is provided for informational purposes only, it demonstrates that

construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations. As such, cumulative construction TAC emissions impacts would be less than significant.

As discussed above in subsection IV.B.3.d), Threshold (c), *Operational Activities – TAC Emissions*, toxic or carcinogenic air pollutants are not expected to occur or be released in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Therefore, cumulative impacts related to operational TAC emissions would be less than significant.

**For these reasons, the Project's cumulative impacts related to construction would be mitigated to less than significant with MM-AQ-1 and operational criteria pollutant and TAC emissions would be less than significant.**

## (2) Consistency with Air Quality Management Plan

Additionally, the SCAQMD recommends assessing a project's potential cumulative impacts based on whether it is consistent with the AQMP.

For purposes of the cumulative air quality analysis with respect to State CEQA Guidelines Section 15064(h)(3), the Project'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 under Threshold (a).

As discussed in detail above, Project construction would be consistent with the AQMP, which is intended to bring the Air Basin into attainment for all criteria pollutants. As stated above, regional emissions have the potential to affect the Air Basin. The SCAQMD AQMP is designed to bring the Air Basin into attainment of the air quality standards. 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 the attainment demonstration in the AQMP. As discussed above, the Project's construction jobs would not conflict with the 2016 RTP/SCS and Citywide growth projections. With respect to the Project's short-term construction-related air quality emissions and cumulative conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the CAA mandates. Construction of the Project would comply with SCAQMD Rule 403 requirements and the ATCM to limit heavy-duty diesel-motor vehicle idling to no more than 5 minutes at any given time. In addition, the Project would utilize a construction contractor(s) that complies with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation (which specifies that contractors employ fleet-wide heavy-duty equipment that meet stringent emissions standards). Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, compliance with adopted AQMP emissions control measures) would also be imposed on construction projects in the Air Basin, which would include the related projects in the Project Area. As such, construction of the Project would be consistent with the AQMP's growth projections and would not conflict with AQMP control strategies and the Project's contribution to

cumulatively significant construction impacts to air quality would not be cumulatively considerable, and cumulative impacts would be less than significant for regional construction emissions. As such, the Project's cumulative construction impacts to air quality would be less than cumulatively significant.

As discussed in detail above, the Project's location, design, and land uses also render it consistent with the AQMP. The AQMP includes transportation control measures that are intended to reduce regional mobile source emissions. The Project would locate residential and commercial/retail uses in a Transit Priority Area that would be located within a quarter-mile of multiple public transportation options, including Metro bus routes (e.g., 180/181, 217, 2/302, Dash Beachwood, Dash Hollywood) and the Metro Red Line providing direct linkages to Downtown Los Angeles as well as other lines within the Metro Rail system. The Project's proximity to public transit allows the Project's projected growth to be accommodated by the City's transportation resources and decreases the time and cost of traveling, as well as vehicular demand and associated pollutants. The Project's increase in population, housing, and employment are therefore consistent with SCAG's RTP/SCS goals and, as a result, consistent with the growth projections for the City as a whole. The Project would therefore also be consistent with the growth projections as contained in the City's General Plan, and ultimately consistent with the growth projections in the AQMP, since the growth would occur in a Transit Priority Area resulting in highly transportation-efficient growth, which would minimize potential growth in transportation-related emissions. As such, the Project's contribution to cumulative operational impacts to air quality would be less than cumulatively significant.

As discussed above, construction and operation of the Project would not conflict with or obstruct implementation of the AQMP, and would also be affirmatively consistent with the AQMP, as the Project has incorporated into its design appropriate strategies set forth in the AQMP for achieving its emission reduction goals and the Project is consistent with the demographic and economic assumptions upon which the AQMP is based. **As such, the Project's contribution to cumulative construction and operational impacts to air quality would be less than cumulatively significant.**

## **f) Mitigation Measures**

Project impacts regarding air quality would be potentially significant for construction emissions. Therefore, mitigation measures are required. The following mitigation measure would reduce construction-related emissions:

**MM-AQ-1: Construction Measures:** The Project shall utilize off-road diesel-powered construction equipment that meets the CARB and USEPA Tier 4 Final off-road emissions standards for equipment rated at 50 hp or greater during Project construction. To the extent possible, pole power shall be made available for use with electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable)

shall be available upon request at the time of mobilization of each applicable unit of equipment.

### **g) Level of Significance After Mitigation**

Project-level and cumulative construction impacts with regard to air quality could be potentially significant but would be mitigated to less than significant with implementation of MM-AQ-1, as shown above in Tables IV.B-7 and IV.B-10 and as discussed in Threshold (b) and Threshold (c) in subsections IV.B.3.d).

Project-level and cumulative operational impacts with regard to air quality would be less than significant without mitigation.

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## **IV. Environmental Impact Analysis**

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### **C. Cultural Resources**

#### **1. Introduction**

This section evaluates potential impacts from the Project on cultural resources, specifically historical and archaeological resources. The analysis of historical resources provided in this section is based on the *Historical Resources Assessment and Environmental Impacts Analysis Report* (Historical Resources Assessment Report) prepared by ESA's Historic Resources Division in August 2019 and the 6220 Yucca Street Historical Resources Peer Review Report (Historical Resources Peer Review Report), prepared by ICF in August 2019, both included in Appendix D of this Draft EIR. The evaluation of archaeological resources is based on the *Archaeological and Paleontological Resources Assessment for the Proposed 6220 West Yucca Street Project* (Archaeological and Paleontological Resources Assessment), prepared by ESA, dated April 2018, and provided in Appendix D of this Draft EIR.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

Cultural resources fall within the jurisdiction of the federal, State, and local designation programs. Federal laws provide the framework for the identification, and in certain instances, protection of historical resources. Additionally, the state and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The relevant regulations are described below.

##### **(1) Federal**

###### **(a) *National Register of Historic Places***

The National Register of Historic Places (National Register) was established by the National Historic Preservation Act (NHPA) as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”<sup>1</sup> The National Register recognizes properties that are significant at the federal, state, and/or local levels.

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<sup>1</sup> 36 CFR Section 60.2.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;
- C. It embodies 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;
- D. It yields, or may be likely to yield, information important in prehistory or history.<sup>2</sup>

Districts, sites, buildings, structures, and objects that are old enough to be considered historic (typically at least 50 years in age) must also meet one or more of the above criteria and retain integrity to be eligible for listing. Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.<sup>3</sup> Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association.

To retain historic integrity, a property must possess most of the seven aspects listed above.<sup>4</sup> The retention of specific aspects of integrity is paramount for a property to convey its own historic significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when a property is significant.<sup>5</sup> For properties that are considered significant under National Register Criteria A and B, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (“*National Register Bulletin 15*”) explains, “a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).”<sup>6</sup> In assessing the integrity of properties that are considered

<sup>2</sup> “Guidelines for Completing National Register Forms,” in *National Register Bulletin 16*, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.

<sup>3</sup> *National Register Bulletin 15*, p. 19.

<sup>4</sup> The National Register defines a property as an “area of land containing a single historic resource or a group of resources, and constituting a single entry in the National Register of Historic Places.” A “Historic Property” is defined as “any prehistoric or historic district, site, building, structure, or object at the time it attained historic significance. Glossary of National Register Terms, <https://www.nps.gov/subjects/nationalhistoriclandmarks/glossary.htm>, accessed June 1, 2013.

<sup>5</sup> *National Register Bulletin 15*, p. 44.

<sup>6</sup> “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.” *Ibid*, p. 46.



significant under National Register Criterion C, *National Register Bulletin 15* states, “a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”<sup>7</sup>

## (2) State

### (a) *California Office of Historic Preservation*

The California State Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation (DPR), implements the policies of the NHPA on a Statewide level. The OHP also carries out the duties as set forth in the Public Resources Code (PRC) and maintains the Historic Resources Inventory (HRI) and the California Register of Historical Resources (California Register). The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State’s jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

### (b) *California Register of Historical Resources*

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the California Register of Historical Resources (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.”<sup>8</sup> The criteria for eligibility for the California Register are based upon National Register criteria.<sup>9</sup> 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.<sup>10</sup> To be eligible for the California Register, a pre-historic or historic property must be significant at the local, state, and/or federal level under one or more of the following 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

<sup>7</sup> “A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.” Ibid.

<sup>8</sup> California Public Resources Code Section 5024.1(a).

<sup>9</sup> California Public Resources Code Section 5024.1(b).

<sup>10</sup> California Public Resources Code Section 5024.1(d).

4. Has yielded, or may be likely to yield, information important in prehistory or history.<sup>11</sup>

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 historical resource may not retain sufficient integrity to meet the criteria for listing in the National Register of Historic Places (National Register), but it may still be eligible for listing in the California Register.

Archaeological resources, in contrast to built environment historic period resources, are most often eligible under Criterion 4 for their ability to yield information important in prehistory or history. For properties eligible under Criterion 4, less attention is given to their overall condition than if they were being considered under Criteria 1, 2, or 3. Archeological sites in particular do not exist today exactly as they were when they were formed as there are virtually always human-made and natural processes that have covered or otherwise altered the deposited materials and their spatial relationships, particularly in highly developed modern urban environments. Accordingly, for properties eligible under Criterion 4, integrity is based upon the property's potential to yield specific data that addresses important research questions.<sup>12</sup>

The California Register includes resources that are automatically included as indicated above 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;
- Those California Points of Historical Interest (PHI) that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission (Commission) for inclusion on the California Register.<sup>13</sup>

Other resources which may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance rating of Category 1 through 5:<sup>14</sup>

<sup>11</sup> PRC Section 5024.1(c).

<sup>12</sup> National Register Bulletin 15, page 46.

<sup>13</sup> Ibid.

<sup>14</sup> Those properties identified as eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or a local jurisdiction register.

- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an Historic Preservation Overlay Zone (HPOZ).<sup>15</sup>

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of the same seven aspects of integrity as the National Register: location, design, setting, materials, workmanship, feeling, and association. Similar to the National Register, a resource must be judged with reference to the particular criteria under which the resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.<sup>16</sup>

However, a resource listed on the California Register that has lost substantial integrity can be delisted from the California Register per procedures established by the Commission. As delineated in the California Code of Regulations, the Commission “may remove an historical resource from the California Register if... the historical resource, through demolition, alteration, or loss of integrity has lost its historical qualities or potential to yield information.”<sup>17</sup>

As discussed in more detail in the Historical Resources Assessment Report provided in Appendix D of this Draft EIR<sup>18</sup> removal of a resource from the California Register requires a formal determination by the Commission based on the evaluation by qualified professionals of historical data about the resource. A request for removal of a resource shall include:

- A written request from the Officer, resource owner, a member of the public, or local government in which the historical resource is located recommending the removal of the resource, including a detailed justification based on the criteria listed in Section 4856(a)(1) or (2);
- Photographs and other documentation regarding the current condition of the historical resource;

<sup>15</sup> PRC Section 5024.1(e)

<sup>16</sup> Codified in California Code of Regulations, Title 14, Chapter 11.5, Section 4852(c) which can be accessed on the internet at <http://ohp.parks.ca.gov>

<sup>17</sup> California Code of Regulations 4857

<sup>18</sup> See pages 13-14 of the Historical Resources Assessment Report.

- Photographic and archival documentation of the historical resource at the time of listing; and
- Complete current ownership information for historical resources included in the listing.

OHP reviews the request and schedules a hearing to take evidence concerning whether the criteria for removal meets the required criteria. The Commission notifies the resource owner, local government, and applicant a minimum of 60 days in advance of the scheduled hearing. If the specific criteria have been met, the resource is removed, and if not, the resource remains listed. The Commission notifies the resource owner, local government, and applicant of its decision within 60 days of making a decision. The Commission's decision is final and binding unless a request for reconsideration in accordance with applicable State law is made.

*(c) California Environmental Quality Act (CEQA)*

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the State.

Regarding historical resources, CEQA generally requires a lead agency to evaluate whether a project may result in a substantial adverse impact affecting the significance of an historic resource. CEQA, thus, requires a lead agency to make two determinations regarding potential impacts to a historic resource. First, the lead agency must determine whether the project analyzed would impact a CEQA-defined historic resource. Second, if there is an historic resource that will be impacted, the lead agency must decide if a project's potential impacts on the resource would be "significant".<sup>19</sup>

*1. Determining What is A Historical Resource Under CEQA*

CEQA provides protection to four categories of historical resources.<sup>20</sup> First is a resource either listed in or determined to be potentially eligible for listing in the California Register by the Commission. These resources are automatically be granted status as an historic resource under CEQA.<sup>21</sup> Second is a resource listed in local registers of historical resources or otherwise officially designated by a local government agency as historic by ordinance or resolution of the agency's governing body.<sup>22</sup>

Third is a resource listed in a local survey that meets all four of the criteria of PRC Section 5024.1(g). The second and third categories of historical resources under CEQA are

<sup>19</sup> CEQA Guidelines § 15064.5(a) and (b)

<sup>20</sup> Pub. Res. Code § 21084.1.

<sup>21</sup> League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland, 52 Cal. App. 4<sup>th</sup> 896, 906 (1997).

<sup>22</sup> Citizens for Responsible Development in West Hollywood v. City of West Hollywood. 39 Cal. App. 4<sup>th</sup> 390, 503-504 (1995); Pub. Res. Code § 5020.1(k)

*presumed* by lead agencies to be historical resources, but that presumption can be overcome by a "preponderance of the evidence."<sup>23</sup>

Fourth, where a resource does not meet the above definitions, a lead agency may nonetheless exercise its discretion to treat the resource as historic under CEQA Guidelines Section 15064.5(a)(3). CEQA Guidelines Section 15064.5(a)(3) states:

“Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historic resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.”

Based on these four categories, courts have determined that there are three levels of historical resources under CEQA: (1) *mandatory* historical resources under category 1 above that are per se historical resources, (2) *presumptive* historical resources under categories 2 and 3 that are presumed to be historical resources unless a preponderance of evidence indicates otherwise, and (3) *discretionary* historical resources under category 4 that a lead agency "may" treat as historic under CEQA Guidelines Section 15064.5(a)(3) if substantial evidence supports the determination.

## 2. Impacts to Historical Resources Under CEQA

If a lead agency determines that a project may adversely affect a historic resource, then the agency must evaluate whether that impact will result in a substantial adverse change in the significance of that resource.<sup>24</sup> The CEQA Guidelines define a "substantial adverse change in the significance of a historic resource" to mean "physical demolition, destruction, relocation or alteration of the resource or its immediate surroundings such that the significance of the resource is *materially impaired*."<sup>25</sup> A substantial adverse change results in a "material impairment" when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historic significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historic Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency

<sup>23</sup> CEQA Guidelines § 15064.5(a)(2).

<sup>24</sup> Pub. Res. Code § 21084.1; CEQA Guidelines § 15064.5(b).

<sup>25</sup> CEQA Guidelines § 15064.5(b)(1).

reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historic significance and that justify its eligibility for inclusion in the California Register of Historic Resources as determined by a lead agency for purposes of CEQA.<sup>26</sup>

If an impact on a historic resource does not involve a “substantial adverse change” in the significance of the resource, no significant impact under CEQA has occurred.<sup>27</sup>

### 3. *Impacts to Archaeological Resources under CEQA*

CEQA requires lead agencies to determine if a proposed project would have a significant impact on archaeological resources (Public Resources Code Sections 21000 et seq.). As set forth in Section 21083.2 of the Public Resources Code, and EIR need only address “unique” archaeological resources defined as archaeological artifacts, objects, or sites, 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:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state.<sup>28</sup> Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1. Planning construction to avoid archaeological sites.
2. Deeding archaeological sites into permanent conservation easements.
3. Capping or covering archaeological sites with a layer of soil before building on the sites.
4. Planning parks, greenspace, or other open space to incorporate archaeological sites.<sup>29</sup>

<sup>26</sup> CEQA Guidelines § 15064.5(b)(2).

<sup>27</sup> Citizens for Responsible Development in West Hollywood, 39 Cal. App. 4<sup>th</sup> at 501-502.

<sup>28</sup> Pub. Res. Code § 21083.2(b).

<sup>29</sup> Id.

To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures are required, including the payment by the project applicant of a portion of mitigation costs, and excavation if substantial evidence supports the conclusion that it would mitigate impacts to a less than significant level.<sup>30</sup>

State CEQA Guidelines §15064.5 recognizes that certain archaeological resources may also have significance as “historical resources” regardless of whether they qualify as unique archaeological resources, if the resources meet the criteria for historical resources stated above.

Under CEQA Guidelines §15064.5(c), if a lead agency determines that an archaeological site is a historical resource, the provisions of §21084.1 of the Public Resources Code and §15064.5 of the State CEQA Guidelines apply, and the requirements of Public Resources Code § 21083.2 do not apply. If an archaeological site does not meet the criteria for a historical resource contained in the State CEQA Guidelines, but does meet the definition of a unique archaeological resource, then the site is to be treated in accordance with the provisions of Public Resources Code §21083.2. The State 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. (§15064.5(c)(4)).

*(d) California Health and Safety Code Pertinent to Human Remains*

California Health and Safety Code sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resource Code), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American human remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

Section 15064.5(e) of the California Code of Regulations addresses the accidental discovery of human remains in any location other than a dedicated cemetery and provides the specific steps to follow in such an event. These steps include the immediate notification of the County Coroner and the halting of any further disturbance to the discovery until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC would then identify the person(s) thought to be the Most Likely Descendent (MLD). Upon the discovery of the Native American remains, the landowner would ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, is not damaged or disturbed by further development activity until the

<sup>30</sup> Pub. Res. Code § 21083.2(c) – (f).

landowner has discussed and conferred, with the MLD regarding their recommendations, taking into account the possibility of multiple human remains. The landowner would discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

The MLD may, with the permission of the landowner, inspect the site of the discovery of the Native American remains and may recommend to the landowner means for treating or disposing, with appropriate dignity, the human remains and any associated funerary objects. The MLD would complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and cultural items associated with Native American burials.

If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative would inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

### (3) Local

#### (a) *City of Los Angeles General Plan Conservation Element*

The City of Los Angeles's General Plan Conservation Element (Conservation Element), Chapter II, Section 3, defers to the State *CEQA Guidelines* in regard to the identification, evaluation, and mitigation of impacts to archaeological resources. The Conservation Element states that the City has primary responsibility for protecting significant archaeological resources. Furthermore, if it is determined that a development project may disrupt or damage an archaeological site, the project is required to provide mitigation measures to protect the site or enable study and documentation of the site, including funding of the study by the Applicant. The City's environmental guidelines require the Applicant to secure services of a qualified 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 evaluated and, if deemed appropriate, the resources protected, documented, and/or removed. <sup>31</sup>

The Conservations Element lists the following objective and policy for archaeological and paleontological resources:

<sup>31</sup> City of Los Angeles General Plan Conservation Element, Chapter II, Section 3, adopted September 2001, pages II-3 through II-6.



**Objective:** Protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes.

**Policy:** Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.

(b) *Los Angeles Cultural Heritage Ordinance*

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1967 and amended it in 2007 and 2018 (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7). The Cultural Heritage Ordinance establishes criteria for designating a local historic resource as an Historic-Cultural Monument (HCM). 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 of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Cultural Heritage Commission if it meets at least one of the following criteria:

5. 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;
6. Is associated with the lives of historic personages important to national, state, or local history; or
7. 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.<sup>32</sup>

With regard to integrity, the seven aspects of integrity of the National Register and California Register are similarly analyzed and the threshold of integrity for individual eligibility is the same.<sup>33</sup>

(c) *Los Angeles Historic Preservation Overlay Zone (HPOZ)  
Criteria for Designation*

City of Los Angeles Ordinance Number 175891 (Ordinance), found in Section 12.20.3 of the Los Angeles Municipal Code (LAMC), describes the procedures for the creation of new HPOZs, the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs. The Ordinance was amended by the Los Angeles City Council on April 25, 2017, and became effective on June 17, 2017.<sup>34</sup> An HPOZ is an area of the City

<sup>32</sup> Ordinance No. 185472 amending Section 22.171 of Article 1, Chapter 9, Division 22 of the Los Angeles Administrative Code to clarify Historic-Cultural Monument designation criteria, enhance due process and notification procedures affecting property owners, and provide for extensions of time limits, effective date April 228, 2018, Council File No. 16-0126 ([https://planning.lacity.org/odocument/f740b82d-c0e6-451c-a99f-d36f1ff262a9/Cultural\\_Heritage\\_Ordinance\\_Revised\\_2018.pdf](https://planning.lacity.org/odocument/f740b82d-c0e6-451c-a99f-d36f1ff262a9/Cultural_Heritage_Ordinance_Revised_2018.pdf), accessed August 13, 2019).

<sup>33</sup> What Makes a Resource Historically Significant? City of Los Angeles Office of Historic Preservation. Accessed April 20, 2016.

<sup>34</sup> City of Los Angeles, Department of City Planning, Office of Historic Resources, "Citywide HPOZ Ordinance," accessed July 17, 2017.

which is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural or aesthetic significance. Before an HPOZ may move into the formal adoption process, an historical resources survey of the proposed district must be completed. The survey studies the historic and architectural significance of the neighborhood and identifies structures and features as either “contributing” or “non-contributing” to the district. According to Section 12.20.3 of the LAMC, features designated as contributing must meet one or more of the following criteria:

- Adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses Historic integrity reflecting its character at that time; or
- Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
- Retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of an Historic place or area of Historic interest in the City.<sup>35</sup>

## **b) Existing Conditions**

### **(1) Historical resources**

#### *(a) Existing Site Improvements*

The 1.16-acre (approximately 50,364-square-foot) Project Site consists of four parcels (Assessor Parcel Numbers (“APN”) 5546-031-031, 5546-031-007, 5546-031-008, and 5546-031-027) on the south side of West Yucca Street between Argyle Avenue and North Vista del Mar Avenue (addresses: 1756, 1760 North Argyle Avenue; 6210-6218 and 6220-6224 Yucca Street; and 1765, 1771, 1777, and 1779 North Vista del Mar Avenue) in the Hollywood Community Plan area of the City of Los Angeles, approximately five miles northwest of Downtown Los Angeles. The Project Site is bounded by Yucca Street, Kimpton Everly Hotel, and 3-story residential lofts to the north; North Vista del Mar Avenue and one- and two-story single-family residences and duplexes to the east; vacant land (former Little Country Church of Hollywood) and one- and two-story single-family residences and duplexes followed by a five-story mixed-use residential and commercial development to the south; and Argyle Avenue and the 16-story Argyle House mixed-use project to the west (please see Figure II-2, *Aerial Photograph with Surrounding Land Uses*, in Chapter II, *Project Description*, of this EIR).

The Project Site is currently improved with three two-story apartment buildings (“Yucca Argyle Apartments”) and associated carports and paved surface parking areas, one single-family residence located (“1771 Vista del Mar Avenue”), and one duplex (“1765 Vista del Mar Avenue”), all of which would be demolished and removed to support the

<sup>35</sup> City of Los Angeles, Planning and Zoning Code, Section 12.20.3.F.3, Historic Preservation Overlay Zone. Available at: [https://preservation.lacity.org/sites/default/files/16-1157\\_ord\\_184903\\_5-5-17.pdf](https://preservation.lacity.org/sites/default/files/16-1157_ord_184903_5-5-17.pdf). Accessed September 2019.

development of the Project. The western portion of the Project Site is improved with the Yucca Argyle Apartments constructed in 1953. Two of the apartment buildings are oriented north toward Yucca Street, while the smaller third building faces west toward Argyle Avenue. A parking lot is located behind the buildings and is accessed via two driveways on Yucca Street. A single-family residence at 1771 Vista del Mar Avenue and a duplex at 1765 Vista del Mar Avenue occupy the east end of the Project Site and are both oriented to the east toward Vista del Mar Avenue. 1765 Vista del Mar Avenue was originally constructed as a one-story single-family residence in 1918. In 1935, the property's owner added a second floor, converting the residence into a two-story duplex. A detached garage was altered in 1931, adding a second floor to serve as servant's quarters. Today, the servant's quarters are used as a studio apartment. Directly adjacent to 1765 Vista del Mar Avenue to the north is 1771 Vista del Mar Avenue. Constructed in 1920 as a Craftsman style bungalow with wood cladding, the residence has been significantly altered with the addition of stucco siding, roofing, and windows after the original construction. All structures over 45 years in age situated on the Project Site were evaluated for their eligibility as potential historic resources and potential impacts to identified historical resources were analyzed and are summarized below.

(b) *Historical Background*

(i) *Del Mar Tract*

Both residences at 1765 and 1771 Vista del Mar Avenue are located with the Del Mar Tract, an early subdivision of Hollywood. Hollywood, an unincorporated town site located approximately six miles northwest of Downtown Los Angeles, was platted on a 120-acre tract purchased by Harvey Wilcox in 1886. Approximately nine years later, the Vista del Mar Tract was subdivided. The 1905 Del Mar Tract map shows that the area was originally subdivided without Vista del Mar Avenue running perpendicular between Yucca Street (originally known as Larquier Avenue) and Carlos Avenue. A 1913 Sanborn map shows the area sparsely developed with only two single-family residences on the south side of Yucca Street. Vista del Mar Avenue was added later in 1913, when the area was re-subdivided as Tract 2209 by property owners Josephine and Elias Twist.

Shortly after Vista del Mar Avenue was added to the tract, the area became fully developed. A Sanborn map from 1919 depicts ten of the twelve lots flanking Vista del Mar Avenue containing single-family residences. The map also shows all of the currently extant residences along the south side of nearby Carlos Avenue (included in the Vista del Mar-Carlos Historic District, discussed further below). In 1920, the home at 1771 Vista del Mar Avenue was constructed. In 1922, the last available lot in Tract 2209 was developed with a single-family residence at 1763 Vista del Mar Avenue.

East of the Del Mar Tract and Tract 2209 was Tract 3148, which was purchased by Albert G. Bartlett and subdivided in 1917. Bartlett, the owner of Bartlett Sheet Music in Downtown Los Angeles, built a large home on the seven-acre parcel, where he lived until his death in 1923. Surrounding the extravagant home were gardens exhibiting Bartlett's interest in botany. The Bartlett residence is depicted in the 1913 and 1919 Sanborn maps.

In 1929, six years after Bartlett's passing, the area was re-subdivided as Tract 10149. The new layout included Argyle Avenue as it is seen today and divided the Bartlett property into four lots. A 1950 Sanborn map shows the former Bartlett property occupied by the Little Country Church of Hollywood in Lot 2 of the new subdivision.

Population pressures in the Hollywood area influenced changing building types (single-family to multi-family residential) during the early post-war era. There were two primary catalysts responsible for this change. First, U.S. Highway 101 (US-101 or Hollywood Freeway) was located in close proximity to this area, and, second, the local perception of Hollywood as the nexus of the motion picture industry declined during this period, resulting in Hollywood and Sunset boulevards losing their desirability as entertainment and shopping venues. Many local residents came to perceive the central Hollywood area as downtrodden and tawdry, popular only with unsophisticated tourists and starry-eyed newcomers. Demographic changes, continued economic decline, and increased population pressures in the latter half of the twentieth century led to the replacement of large numbers of single-family residences with multi-family dwellings in the non-hillside areas of Hollywood, including the area in which the Project Site is located. By 1953, the Bartlett property was redeveloped with a large garden apartment complex (the Yucca Argyle Apartments located on the Project Site), consisting of three buildings occupying Lots 1 and 3 of Tract 10149, while the Little Country Church of Hollywood continued to occupy Lot 2. The new buildings and the Hollywood Freeway are depicted on a 1955 Sanborn map.

*(ii) Development of 1765 and 1771 North Vista del Mar Avenue*

Building permits on file at the City of Los Angeles Department of Building and Safety were reviewed to determine the history of construction and alterations for the improvements on the Project Site. Additional information regarding the building permits can be found in Tables 1 to 3 included in the Historical Resources Assessment Report in Appendix D of this Draft EIR.

The earliest building and first residence constructed on the Project Site is 1765 North Vista del Mar Avenue (APN: 5546-031-007). Permits indicate an application for the residence's construction was filed on May 3, 1918 by Harold B. Dunn, who was listed as the property owner and architect. The 1919 Sanborn map for the area shows a single-family residence that appears to have the same footprint as the existing building; however, the Sanborn map indicates the residence was a single-story dwelling. Additional permits from 1931 and 1935 document alterations to the residence's garage with the addition of a servant's quarters and conversion of the garage into a double garage. Also in 1935, a permit to expand the residence by adding a second floor was filed by property owner Alice Lee Montrose. The permit indicates the residence originally had a flat roof, but the new second floor addition would add a gabled roof over the new second story. The 1951 and 1955 Sanborn maps show the residence as a two-story structure. Other

permits show interior alterations, including tile work and a remodel in 2010 valued at \$10,000.

The second building constructed on the Project Site is located at 1771 North Vista del Mar Avenue (APN: 5546-031-008). On July 17, 1920, property owner P.C. Gemert hired architect F. M. Tyler to erect a one-story residence (32' x 42') with a concrete foundation, clapboard siding, and a shingle roof. In addition to the dwelling, Gemert had a small garage constructed (12' x 18') valued at \$200. While the residence is not indicated on the 1919 Sanborn map, it is depicted in 1951 and 1955 maps. The 1951 Sanborn map indicates there was an open porch on the south elevation that was in-filled at an unknown date (no building permits is available for this alteration). In 1992, the original wood clapboard siding was removed, and the exterior was sheathed with stucco. Also, in 1992, all of the windows were replaced. Additional permits show minor work for termite damage and replacement of the roof.

### *(iii) Development of the Yucca Argyle Apartments*

Permits show the Yucca Argyle Apartments were permitted on June 17, 1953. The applications were filed on behalf of the Junior Realty Company. The contractor on record was Carson Park Builders, and Joseph Solomon was listed as the engineer. Due to its construction date of 1953, the Yucca Argyle Apartments are only depicted in the 1955 Sanborn map. Prior to their construction, the property was occupied by a single-family residence owned by Albert G. Bartlett (the lot associated with the former Bartlett residence was subdivided into four lots that include the present Little Country Church of Hollywood property). Because the Bartlett residence was demolished by 1953, only permits pertaining to the existing buildings were reviewed. Permits show the construction of three apartment buildings and garages. Aside from their construction in 1953, very little work indicated in City building records has been done to the buildings. In 1973, the property owner requested a permit to make repairs to one of the apartment units due to fire damage. Permits also show roof maintenance in 2000 and 2002.

#### *(a) Multi-Family Residential Development: 1950s-1960s Courtyard Apartment*

The Yucca Argyle Apartments are an example of a Courtyard Apartment, as applied to a post-war apartment complex. Two of the three buildings are arranged in a "U"-shaped footprint with central courtyards. Typically, the Courtyard Apartment property type has two buildings arranged around a central landscaped courtyard. The origin of the Courtyard Apartment property type reaches back to the Los Angeles region's rapid growth in the early decades of the twentieth century when its predecessor, the bungalow court, appeared and evolved as a building type. From its origins as tourist accommodations to its prevalence as high-density housing, the bungalow court became a common Southern California building type prior to World War II.

The Courtyard Apartment was the natural successor to the earlier development of the bungalow court in Southern California. Courtyard apartments were first built beginning in the 1910s, when multi-family residential construction in Los Angeles began in earnest,

with the type continuing to evolve in form and style through the 1960s. However, proliferation of the courtyard apartment in Los Angeles reached its zenith in the 1920s and coincided with the greatest population growth in the City's history. While the bungalow court reflected the earliest attempt at a compromise between privacy and density, the pressing demand for more housing made it necessary to develop a higher-density alternative.<sup>36</sup>

The 1950s and 1960s marked another shift in the development of courtyard housing complexes. This period witnessed a new boom in apartment construction, as post-war baby boomers were getting married and preparing to start families of their own. However, for many young couples and families just starting out, a single-family home in the Los Angeles area was financially out of reach. Similarly, Los Angeles newcomers, attracted to the region by growing industries such as airplane manufacturing, often found that the cost of a detached single-family house was far higher in Los Angeles than from where they had just arrived. Despite unprecedented financial prosperity, Southern California housing costs were escalating more rapidly than the national cost of living.<sup>37</sup> Additionally, the extension of commercial corridors and connecting traffic arteries, which were zoned for multi-family residential development, opened up large parcels of land for apartment construction. Construction firms, which perfected their mass-production techniques in the 1940s with the construction of single-family residential developments, were able to apply their experience to the development of apartment houses, which were sometimes constructed in groups of fifty at a time.<sup>38</sup> The resultant buildings tended to be larger than their 1920s or 1940s counterparts. In the postwar period, land values typically dictated higher densities, with building sometimes reaching three stories in height instead of just two, and frequently developed on two or more residential lots. Buildings still exhibited the typical O, U, or E-shaped plans – or paired L-shaped plans – oriented around a central common space. However, these spaces now frequently featured concrete patios and swimming pools.<sup>39</sup>

Common features of post-war apartment complexes in Southern California included rectilinear massing; flat or low-pitched hipped roofs; overhanging eaves; stucco finish and/or wood siding; natural rock veneers; metal-framed fixed, sliding, and/or casement windows; cantilevered balconies or exterior walkways; and custom signage or themed imagery on the primary façade. Parking garages were either incorporated into the ground level of the apartment buildings or provided in a separate ancillary building.

<sup>36</sup> Subtheme: Courtyard Apartments, 1910-1969, in SurveyLA Context: Residential Development and Suburbanization/Multi-Family Residential Development, 1896-1970, Theme: Multi-Family Residential Development, 1895-1970, page 52-53.

<sup>37</sup> Merry Ovnick, Los Angeles: The End of the Rainbow (Los Angeles: Balcony Press, 1994), 311-312.

<sup>38</sup> Ibid., 312.

<sup>39</sup> Subtheme: Courtyard Apartments, 1910-1969, in SurveyLA Context: Residential Development and Suburbanization/Multi-Family Residential Development, 1896-1970, Theme: Multi-Family Residential Development, 1895-1970, pages 57-58.

While the better examples of these postwar courtyard complexes employed architects, such as Edward Fickett, most were builder designed. Buildings typically displayed modest interpretations of popular styles at the time, including most commonly Mid-Century Modern and the Traditional/California Ranch style. Examples of 1950s and 1960s courtyard apartments can be found throughout the areas of Los Angeles that were built up during the postwar period. These areas include neighborhoods of West Los Angeles and the San Fernando Valley. Apartments tend to be concentrated along automobile corridors and adjacent to freeways.<sup>40</sup>

Beginning in the 1940s, a handful of innovative developers designed neighborhood-scale development projects which became models of postwar community planning. Planned communities such as Fritz B. Burns and Henry J. Kaiser's Panorama City and Paul Trousdale's Westdale Village in Mar Vista were replicated throughout Los Angeles during the 1950s and 1960s. One of the characteristic features of these new developments was the placement of slightly higher-density dwellings along major thoroughfares at the perimeter of single-family neighborhoods. These properties not only provided a buffer between the traffic artery and the single-family neighborhood behind, but also made the community financially accessible to those of lesser means. Additionally, designing the courts in similar styles to the adjacent single-family neighborhoods made them compatible with surrounding development in both style and scale. The popularity of courtyard housing as a multi-family dwelling type began to wane by the 1960s, due in part to the Height District Map adopted by the Los Angeles City Council in 1958. This gave rise to a new wave of high rise multi-family residential development, a trend which continues to this day.<sup>41</sup>

*(c) Historical Resources Identified within the Project Vicinity and Project Site*

The records search for cultural resources within the Project vicinity (approximately 0.25-mile radius) involved review of previous surveys records and reports on file at the South Central Coastal Information Center (SCCIC). The results of the records search from the SCCIC is included in the Historical Resources Assessment Report. As the Project site is located within a dense, urban setting with limited visibility of the surrounding setting from the ground level, the 0.25-mile radius records search was conducted to capture all known resources within the Project vicinity, which may have views of the Project Site for the purpose of analyzing potential indirect impacts on the resources. The National Register, California Register, Statewide HRI, California PHI, California Historical Landmarks (CHL), City of Los Angeles HCM, SurveyLA, and the 2010 Historical Resources Survey of the Hollywood Redevelopment Project Area (2010 Hollywood Survey) were also reviewed to locate previously identified historical resources within the Project vicinity.

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<sup>40</sup> Ibid.

<sup>41</sup> Ibid., 60-61.

(i) *Historical Resources Identified in the Project Vicinity*

The records search and review indicated that 16 previously identified individual historical resources are situated within a 0.25-mile radius of the Project Site that, based on their proximity, were considered and analyzed for any potential to be indirectly affected by the Project as the result of alteration of their immediate surroundings.<sup>42</sup> A description of the historical resources in the Project vicinity is included in the Historical Resources Assessment Report and the Historical Resources Peer Review Report, both included in Appendix D of this Draft EIR. A summary table listing historical resources identified in the Project vicinity is provided in the Historical Resources Assessment Report in Table 8, Previously Recorded Resources within a 0.25 Mile Vicinity of the Project Site, and are summarized below.

There are five (5) previously identified historical resources listed in the National Register in the Project vicinity.

One (1) nearby historic district is listed on the National Register and California Register (1D CHR Status Code):<sup>43</sup>

- Hollywood Boulevard Commercial and Entertainment District, 6200-7000 Hollywood Boulevard with adjacent parcels on N. Vine Street, N. Highland Avenue and N. Ivar Street.<sup>44</sup>

There are four (4) nearby previously identified individual historical resources listed on the National Register in the Project vicinity (1S CHR Status Code),<sup>45</sup> including the:

- Guaranty Building/Allstate Title Building (6331 Hollywood Boulevard),

<sup>42</sup> Historical resources were identified during the 2010 Historical Resources Survey of the Hollywood Redevelopment Project Area.

<sup>43</sup> Contributor to a district or multiple resources property listed in NR by Keeper. Listed in CR.

<sup>44</sup> The verbal boundary description on the National Register nomination form states the following: "The Hollywood Boulevard Commercial and Entertainment District commences at the northwest corner of Hollywood Blvd. and Argyle Ave. and proceeds west to the northwest corner of Hollywood Blvd. and Cherokee following the street; thence to the northeast corner of Hollywood Blvd. and Highland Ave., each parcel with Boulevard frontage; thence along the street to the northwest corner of Orchid Ave; and Hollywood; thence one parcel deep to western boundary of 7065 Hollywood Blvd; then east from the southeast corner of Sycamore Ave. and Hollywood Blvd. one parcel deep to southwest corner of Hudson Ave.; then east following the street to southeast corner at Wilcox and Hollywood Blvd.; then east one parcel deep to two parcels east of Vine Street. Also included is the parcel directly south of the southeast corner of Hollywood and Highland on the east side of Highland; one parcel north of northeast corner of N. Ivar and Hollywood on the east side of Ivar; and three parcels north of northwest corner of Hollywood and Vine on the west side of Vine St; one parcel south of southwest corner of Hollywood and Vine on the west side of Vine; and three parcels south of the southeast corner of Hollywood and Vine on the east side of Vine St. Boundaries are based upon the remaining integrity of the Hollywood Boulevard Commercial and Entertainment area." Christy Johnson McAvoy, Hollywood Heritage, National Register of Historic Places Inventory—Nomination Form, Hollywood Boulevard Commercial and Entertainment District, April 4, 1985, Continuation Sheet Item Number 10 Page 1, (<https://npgallery.nps.gov/GetAsset/236d3254-47ee-4b31-9045-c2999cc465f2/>, accessed August 13, 2019).

<sup>45</sup> Individual property listed in the NR by the Keeper. Listed in the CR.



- Security Trust and Savings (6381-85 Hollywood Boulevard),
- Halifax Apartments (6376 Yucca Street), and
- Hollywood Tower/La Belle Tour (6200 Franklin Avenue).

One (1) nearby previously identified individual historical resource is listed in the California Register and determined eligible for the National Register by consensus through the process set forth under Section 106 of the NHPA ("Section 106") (2S2 CHR Status Code):<sup>46</sup>

- The Hollywood Equitable Building (6253 Hollywood Boulevard)

One (1) nearby/onsite district determined eligible for the National Register by consensus through the through the Section 106 process (2D2 CHR Status Code):<sup>47</sup>

- Vista del Mar/Carlos Historic District

Four (4) nearby properties are designated City of Los Angeles HCMs (5S1 CHR Status Code):<sup>48</sup>

- Pantages Theatre (HCM No. 193), 6233 Hollywood Boulevard
- Little Country Church of Hollywood (HCM No. 567), 1750 N. Argyle Avenue
- Capitol Tower and Rooftop Sign (HCM No. 857), 1740-1750 N. Vine Street
- Hollywood Plaza Hotel and Neon Sign (HCM No. 665), 1633 Vine Street

Three (3) nearby properties appear individually eligible for the National Register (3S CHR Status Code)<sup>49</sup> and are contributors to the National Register listed Hollywood Boulevard Commercial and Entertainment District (1D CHR Status Code):

- BH Dylans Company/Broadway Department Store, 6300 Hollywood Boulevard
- Regency Building/General Nutrition, 6324 Hollywood Boulevard
- Regal Shoe Store, 6349 Hollywood Boulevard

One (1) nearby property appears individually eligible for the National Register (3S CHR Status Code), is listed in the California Register and determined eligible for the National Register through the Section 106 process (2S2 CHR Status Code), and is a designated City of Los Angeles HCM (5S1 CHR Status Code):

<sup>46</sup> Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.

<sup>47</sup> Contributor to a district determined eligible for NR by consensus through Section 106 process. Listed in the CR.

<sup>48</sup> Individual property that is listed or designated locally.

<sup>49</sup> Appears eligible for NR as an individual property through survey evaluation.

- Hollywood Walk of Fame (HCM No. 194)

One (1) nearby property is eligible for local listing or designation (5S2 CHR Status Code):<sup>50</sup>

- 1621 Gower Street

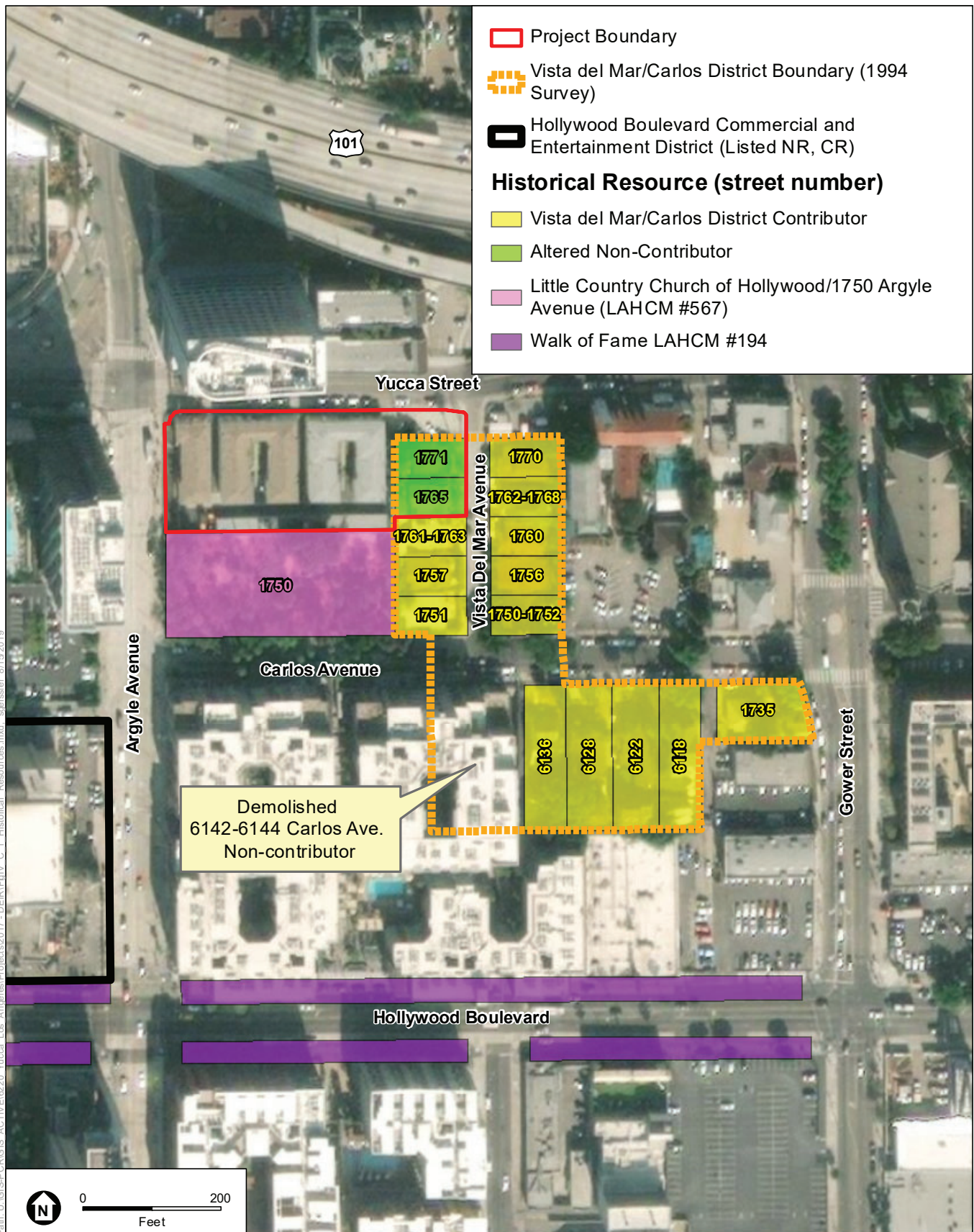
(ii) *Historical Resources Identified within the Project Site*

For the purposes of the analysis in this Draft EIR, 1771 and 1765 North Vista del Mar Avenue (contributors to the Vista del Mar/Carlos Historic District), and 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue (Yucca Argyle Apartments), were re-evaluated, pursuant to PRC, Article 2, Section 5024.1(g)(4), which provides for the update of survey and re-evaluation of historical resources after five years to account for changed circumstances or further documentation. The current architectural description and significance evaluation is included in the Historical Resources Assessment and Historical Resources Peer Review Report included Report in Appendix D in this Draft EIR.

(a) Vista del Mar/Carlos Historic District and 1771 and 1765 North Vista del Mar Avenue

Of the four parcels comprising the Project Site, two parcels (1765 and 1771 North Vista del Mar Avenue) are situated within the Vista del Mar/Carlos Historic District. The Vista del Mar/Carlos Historic District is a presently a contiguous grouping of 13 contributors and three non-contributors occupying an L-shaped area, including the properties flanking North Vista del Mar Avenue (part of Tract 2209) and Carlos Avenue (part of Del Mar Tract) between Yucca Street to the north and North Gower Street to the east. The list of contributors and non-contributors is provided in the Historical Resources Assessment Report in Table 9 and a map of district is depicted on **Figure IV. C-1, Historic Resources Adjacent to the Project Site**. The Vista del Mar/Carlos Historic District is comprised of residences constructed between 1908 and 1922. The identified character-defining features of the Vista del Mar/Carlos Historic District include one- to two-story residences setback from the street behind a lawn or yard, concrete driveways on the side of the lots leading to a rear garage, street layout, sidewalks, and street trees. Most of the residences are designed in the Craftsman or Arts and Crafts style with the exception of a Spanish Colonial style residence. The character of the Vista del Mar/Carlos Historic District differs between the grouping of residences on North Vista del Mar Avenue and Carlos Avenue. Along North Vista del Mar Avenue, the residences are smaller in scale and are mostly one-story single-family residences improved on small identically-sized lots. Vista del Mar Avenue slopes upward to the north, is narrow, has grooved and pebbled paved surface, and sidewalks. The residences along Carlos Avenue are larger in scale, two stories and representative of the Arts and Crafts style, and are sited on larger lots that encourage deeper setbacks.

<sup>50</sup> Individual property that is eligible for local listing or designation.



SOURCE: Open Street Map, 2019.

6220 West Yucca Project

**Figure IV.C-1**  
Historic Resources Adjacent to the Project Site

In a 1984 local survey, the Vista del Mar/Carlos Historic District was found locally significant and assigned a CHR Status Code of 5S2.<sup>51</sup> Both 1765 and 1771 North Vista del Mar Avenue were also identified as contributors to the Vista del Mar/Carlos Historic District in the 1984 survey. In September of 1994, following the Northridge earthquake, the Vista del Mar/Carlos Historic District was resurveyed and assigned a CHR Status Code of 2D2; determined eligible for the National Register by consensus through the Section 106 process.<sup>52</sup> The 1984 survey identified twelve residential neighborhoods in Hollywood that represented the area's early residential development, but, by 1994, development had eliminated four of those areas, and the Vista del Mar/Carlos Historic District was found to assume a "greater significance in the community as an intact grouping of residential architecture representative of the Golden Era of Hollywood."<sup>53</sup> At the time, two buildings contributing to the district were severely impacted by the Northridge Earthquake, 6136 and 6118 Carlos Avenue; otherwise, most of the district was virtually unchanged from when it was previously documented.

The Vista del Mar/Carlos Historic District was surveyed again during the 2010 Hollywood Survey that identified 14 contributors with a 2D2 CHR Status Code in the Vista del Mar/Carlos Historic District. One residence at 1771 North Vista del Mar Avenue was downgraded to 6Z CHR Status Code (ineligible for listing in the California Register) due to substantial alterations adversely affecting its integrity. One residence at 6142-6144 Carlos Avenue was demolished in the late 1990s after suffering substantial damage from the 1994 Northridge earthquake and later replaced with a new non-contributing multi-family residence; 6142-6144 was not identified with a status code in the 2010 Hollywood Survey but had previously been assigned a status code of 2D2 in the 1994 survey. All of the other contributing residences,<sup>54</sup> including 1765 North Vista del Mar Avenue, continued to retain a 2D2 CHR Status Code<sup>55</sup> in the 2010 Hollywood Survey as contributors. It is

<sup>51</sup> Vista del Mar/Carlos Neighborhood District DPR Form, Prepared by L. Heumann and C. McAvoy, Hollywood Heritage/CRA (September 1984).

<sup>52</sup> L. Heumann and C. McAvoy, Vista del Mar/Carlos Neighborhood, Department of Parks and Recreation Historic Resources Inventory form, 19-176308. HRI #100892, July 1, 1994. The following 16 properties were identified as contributors to the Vista del Mar/Carlos Historic District in the 1994 survey: 1735 Gower Street, 6118 Carlos Ave., 6122 Carlos Ave., 6128 Carlos Ave., 6136 Carlos Ave., 6142-44 Carlos Ave., 1750 Vista del Mar Ave., 1751 Vista del Mar Ave., 1756 Vista del Mar Ave., 1757 Vista del Mar Ave., 1760 Vista del Mar Ave., 1763 Vista del Mar Ave., 1764 Vista del Mar Ave., 1767 Vista del Mar Ave., 1770 Vista del Mar Ave., 1771 Vista del Mar Ave.

<sup>53</sup> L. Heumann and C. McAvoy, Vista del Mar/Carlos Neighborhood, Department of Parks and Recreation Historic Resources Inventory form, 19-176308. HRI #100892, July 1, 1994.

<sup>54</sup> The 2010 Hollywood Survey results for the Vista del Mar/Carlos Historic District included the following 14 contributors: 6118 Carlos Ave., 6122 Carlos Ave., 6128 Carlos Ave., 6136 Carlos Ave., 6145 Carlos Ave., 1735 Gower St., 1750 Vista del Mar St., 1756 Vista del Mar St., 1757 Vista del Mar St., 1760 Vista del Mar St., 1762 Vista del Mar Ave., 1763 Vista del Mar Ave., 1765 Vista del Mar Ave., 1770 Vista del Mar Ave. One non-contributor at 1771 Vista del Mar Ave. was identified as ineligible with a 6Z status code. One property at 6142 Carlos Ave. was not identified with a status code in the 2010 survey but had previously been assigned a status code of 2D2 in the 1994 survey. See "Property Index" included in the Historic Resources Survey Report Hollywood Redevelopment Project Area prepared for the Community Redevelopment Agency by Chattel Architecture, Planning & Preservation, Inc., February 2010 ([https://planning.lacity.org/odocument/7de89dca-89c9-494e-8e72-e67694613161/SurveyLAHollywood\\_SurveyReport.pdf](https://planning.lacity.org/odocument/7de89dca-89c9-494e-8e72-e67694613161/SurveyLAHollywood_SurveyReport.pdf), accessed August 12, 2019).

<sup>55</sup> Contributor to a district determined eligible for the National Register by consensus through Section 106 process. Listed in the California Register.

unclear why the one-story Craftsman residence at 1751 North Vista del Mar Avenue was included in the 1994 survey but was not included in the 2010 Hollywood Survey; it currently appears to retain its integrity as a contributor.

As indicated above, although 1771 North Vista del Mar Avenue was previously identified as a contributor to the Vista del Mar/Carlos Historic District in the 1994 survey, 1771 North Vista del Mar Avenue was subsequently found ineligible in the 2010 Hollywood Survey and identified with a 6Z CHR Status Code<sup>56</sup> due to alterations to the building after its original construction that have materially impaired its integrity, and as a result of the 2010 Hollywood Survey it is now considered an altered non-contributor to the district. This conclusion was reconfirmed and is documented in the Historical Resources Assessment Report and Historical Resources Peer Review Report (included in Appendix D in this Draft EIR). Originally a Craftsman style dwelling, the removal of wood clapboard siding, original windows, and doors, the enclosure of the side porch, and the alteration of the entry pediment, have substantially altered the residence beyond recognition. Because the residence can no longer convey its original appearance, it is no longer representative of the development of Tract 2209 and the early development of Hollywood. The residence was originally designed by local architect F.M. Tyler in 1920, but because of the lack of integrity, the residence no longer conveys its association with early twentieth-century architecture or F.M. Tyler, and, thus, it cannot be considered significant either as an individual resource or as a contributor to the Vista del Mar/Carlos Historic District.

The residence at 1765 North Vista del Mar Avenue is not an exceptional, distinctive, outstanding, or singular example of a type or style. Although the original style of the residence is not known, records indicate it was a one-story single-family residence that had a flat roof and therefore it may have been a Spanish Colonial Revival-style bungalow. However, alterations in 1935 added a second floor with a cross-gabled roof and Minimal Traditional details. Therefore, it is not architecturally distinctive because it no longer retains its original style or character-defining features from its individual 1918 period of significance. The residence was originally designed by local Hollywood architect Harold B. Dunn. However, alterations in 1935 have compromised Dunn's original design and therefore the Residence no longer conveys this significance. As part of the preparation of this report, an intensive analysis of 1765 North Vista del Mar Avenue was also conducted to re-evaluate the property's significance and integrity, which includes information that it does not appear was relied on in prior historic assessments of the property. The results of the survey are provided in the Historical Resources Assessment Report, confirmed by the Historical Resources Peer Review Report, both included in Appendix D in this Draft EIR. The analysis indicated substantial alterations including the addition of a second floor that transformed the original single-family residence into a duplex, which occurred outside the identified period of significance for the district. These alterations have resulted a substantial adverse change that materially impairs the property's integrity and significance. In fact, 1765 North Vista del Mar Avenue was incorrectly identified in previous surveys beginning in 1984, when the residence was first identified as a

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<sup>56</sup> Found ineligible for NR, CR or Local designation through survey evaluation.

contributor to the Vista del Mar/Carlos Historic District, despite the survey noting the residence has a second-story addition (1935) that altered the original 1918 residence beyond recognition. It appears that subsequent surveys also repeated this mistake. Therefore, based upon the property research and documentation of the property in the Historical Resources Assessment Report, the intensive-level analysis prepared for this report conclude that 1765 North Vista Del Mar Avenue was incorrectly identified previously as a contributor to the Vista del Mar/Carlos Historic District, and that the property should be reassigned a 6Z CHR Status Code. This conclusion is based on the substantial alterations to the exterior and interior of the building following its initial construction in 1918, including, most-significantly, the second-story addition, as well as the replacement of the original flat roof with a cross-gabled roof in 1935 after the end of the period of significance for the Vista del Mar/Carlos Historic District (1908-1922). Both the second-story addition and roof replacement effectively eliminate the ability of the building to convey its historic associations with early twentieth-century residential neighborhood development in Hollywood, or architect Harold Dunn, and, thus, it cannot be considered significant either as an individual resource or as a contributor to the Vista del Mar/Carlos Historic District.

Consequently, the assessment of both 1765 and 1771 North Vista del Mar Avenue in the Historical Resources Assessment Report and Historical Resources Peer Review Report conclude the residences have both been substantially altered and no longer retain their historic integrity or significance and are, therefore, not eligible at the federal, state, or local levels as contributors to the Vista del Mar/Carlos Historic District. Because neither one of the residences conveys their original historic appearance, they are not representative of the development of Tract 2209 and the early settlement of Hollywood. Furthermore, they are not associated with historic events or personages. Lastly, the residences are not exceptional, distinctive, outstanding, or singular examples of a type or style. Therefore, they are both assigned a CHR Status Codes of 6Z, found ineligible for NR, CR or Local designation through survey evaluation, in the Historical Resources Assessment Report and Historical Resources Peer Review Report. The results of the survey for the two properties, 1765 and 1771 North Vista del Mar Avenue, were recorded on Department of Park and Recreation ("DPR") 523L Continuation Sheets and are included in Appendix G of the Historic Resources Assessment Report (Appendix D in this Draft EIR).

(b) 6210-6218 and 6220-6224 Yucca Street and 1756-1760  
North Argyle Avenue (Yucca Argyle Apartments)

The Yucca Argyle Apartments were surveyed during the 2010 Hollywood Survey, which concluded that the apartments were ineligible for listing in the National Register, California Register, or as a local landmark. The re-evaluation of this property in the Historical Resources Assessment Report and Historical Resources Peer Review Report -similarly conclude the Yucca Argyle Apartments appear ineligible for listing under any federal, State or local eligibility criteria. Built in 1953, the Yucca Argyle Apartments were constructed much later than the development of the surrounding neighborhood and, therefore, do not contribute to the earlier development history of the area. As a product of the post-war era, the Yucca Argyle Apartments are properly associated with Los



Angeles' mid-century population growth after World War II. However, the Yucca Argyle Apartments are physically isolated from other similar multi-family housing developments in Hollywood and do not appear to hold any significant associations with this period of development. Furthermore, the Yucca Argyle Apartments do not appear associated with persons significant to local, State, or national history. Finally, the Yucca Argyle Apartments are common examples of mid-century multi-family residences built as income producing properties and do not meet the threshold of being excellent examples of the courtyard apartment building type or any other building type. Courtyard apartments were designed to create an outdoor common area, taking advantage of the ideal Southern California climate within an urban environment. However, the Yucca Argyle Apartments do not meaningfully reflect this design characteristic due to the lack of balconies and the dominance of concrete pathways, which limit the amount of landscaped space within the courtyard. Alterations to the Yucca Argyle Apartments after its final construction, including the replacement of all windows with modern vinyl sliding windows, have significantly affected the buildings' integrity of design, materials, and workmanship. For the additional reason of a loss of integrity, the buildings are not eligible as excellent examples of the courtyard apartment building type. Furthermore, the Yucca Argyle Apartments are not the work of a master architect or builder. As a result of these investigations (review of previous surveys, survey and research documentation, and re-evaluation of significance in the Historical Resources Assessment Report), the Yucca Argyle Apartments were assigned a CHR Status Code of 6Z, "found ineligible for National Register, California Register or local designation through survey evaluation."

## (2) Archaeological Resources

### (a) *Prehistoric Background (13,000 Years Before Present to AD 1847)*

Archaeology is the recovery and study of material evidence of human life and culture. Over time, this material evidence becomes buried, fragmented or scattered, or otherwise hidden from view. In urban areas such as the Project Site and environs, archaeological resources may include both prehistoric remains (before 1769 A.D.) and remains dating to the region's historical period (1769 to 1950 A.D.). Prehistoric resources can include village sites, temporary camps, lithic (stone tool) scatters, rock art, roasting pits/hearths, milling features, rock features, and burials. Historic archaeological resources can include refuse heaps, bottle dumps, ceramic scatters, privies, foundations, and burials and are generally associated in California with the Spanish Mission Period (after 1769) to the mid-20th century of the American Period. Archaeologists generally divide the human history of the southern California coast region into three major time intervals: Prehistoric, Protohistoric, and Historic (refer to **Table IV.C-1, Cultural Chronology of the Southern California Coast Region**, below). Prehistory is subdivided into the Paleocoastal, Milling Stone, Intermediate, and Late Prehistoric periods. History is subdivided into the Spanish, Mexican, and American periods.

The cultural chronology of the region is a subject of ongoing investigation. The dating of cultural change continues to undergo refinement using the results of new excavations, as

does our understanding of the processes of cultural change. The need for further research accounts for the use of some broad date ranges and the presentation of some key but untested hypotheses within the following discussion.

**TABLE IV.C-1**  
**CULTURAL CHRONOLOGY OF THE SOUTHERN CALIFORNIA COAST REGION**

<b>Date Range</b>	<b>Period</b>
AD 1847-1960	American
AD 1822-1847	Mexican
A.D. 1769-1822	Spanish
A.D. 1542-1769	Protohistoric
1500 BP <sup>a</sup> to AD 1542	Late Prehistoric
4,000-1,500 BP	Intermediate
7,000-4,000 BP	Milling Stone
More Than 7,000 BP	Paleocoastal

BP = Before Present. By convention, "present" is set at AD 1950  
 SOURCE: Adapted from Elsasser (1978) and Schuyler (1978), and modified.

*(i) Prehistory, Early Holocene to AD 1542*

The Project Site is located in the coastal zone of the northernmost Peninsular Ranges portion of the Southern California Coast prehistoric culture area, which encompasses the Transverse Ranges, the northern Peninsular Ranges, and the coastal zone and near-shore islands from Point Conception in the north to San Diego Bay in the south.<sup>57</sup> The subsistence of prehistoric hunter-gatherers in the coastal zone and near-shore islands depended on marine shellfish, fish, and mammals, supplemented with terrestrial game and a variety of terrestrial plants. Further inland, subsistence opportunities were limited to terrestrial plants and animals.

The prehistoric chronology of the region is traditionally divided into Milling Stone, Intermediate and Late Prehistoric periods, but more currently into Early, Middle, and Late Holocene periods.<sup>58</sup> In recent years, some conclusive evidence has emerged supporting human occupation during the late Pleistocene and earliest Holocene periods. The Pleistocene is the geological epoch which started from approximately 2,588,000 to 11,700 years ago; while the Holocene epoch started approximately 11,650 years BP and continues today. Some of the oldest human skeletons found in the Americas were

<sup>57</sup> Elsasser, Albert B., 1978, Development of Regional Prehistoric Cultures. In *Handbook of Native American Indians*, Volume 8: California, pp. 37-57, edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C.

<sup>58</sup> Altschul, J. H, and. D. R. Grenda (editors), 2002, *Islanders and Mainlanders: Prehistoric Context for the Southern California Coast and Channel Islands*. The University of Arizona Press, Tucson.



discovered at the Haverty Site, only about 9.3 miles south-southeast of the Project Site.<sup>59</sup> A more recent study of the Haverty skeletons concludes that at least some of the skeletons may be of “terminal Pleistocene age.”<sup>60</sup> Human bone collected from Santa Rosa Island in 1959 has recently been dated to 10,000-11,500 BP<sup>61</sup> and is contemporaneous with pygmy mammoth bone also found on the island.<sup>62</sup> Human and domestic dog bone, collected in 1994 from La Brea Tar Pits about 7.5 miles south-southeast of the Project Site, has been dated to the beginning of the Holocene, but radiocarbon dating complications make the date uncertain.<sup>63</sup> The Milling Stone Horizon<sup>64</sup> marks a shift from a subsistence strategy which emphasized big game hunting (of which large, fluted spear points, and the bones of butchered large mammals are hallmarks) to one which, for inland populations, emphasized plant seeds (as represented by the manos and metates used to mill them, and carbonized seeds). This presumably adaptive change occurred perhaps as early as 7,000 years BP and no later than about 4,000 or 3,000 BP.<sup>65</sup>

More elaborate material culture represents the subsequent Intermediate period, about 4,000 or 3,000 BP to about 1,500 BP: basket hopper mortars, bowl mortars, pestles, broad leaf-shaped blades, heavy side-notched and leaf-shaped spear points, stemmed atlatl dart points, implements and ornaments of bone, horn, shell, asphalt, and steatite, and inhumations with red ocher and stone cairns. This elaboration of material culture may reflect burgeoning and aggregating populations, and intensified social and political interaction.

The Late Prehistoric period, circa 1,500 BP, marks the advent of the bow and arrow as evidenced by finely chipped, stemless, concave- and convex-based arrow points, and steatite arrow straighteners. Also added to the material culture were steatite containers and shell, bone, and stone ornaments. Inhumations included abundant and diverse grave goods. The bow and arrow may have been adopted or developed primarily as a weapon rather than as a hunting tool, suggesting the full realization of population pressure and territoriality. Laboriously manufactured and visually attractive containers and ornaments, and mortuary customs requiring the sacrifice of considerably valuable material

<sup>59</sup> Brooks, S., et al., 1990, *The Haverty Human Skeletons: Morphological, Depositional, and Geochronological Characteristics*. Journal of California and Great Basin Anthropology 12(1).

<sup>60</sup> Ibid.

<sup>61</sup> Johnson, J. R., 2002, Arlington Springs Revisited. In *Proceedings of the Fifth California Islands Symposium*, pp. 541-545. USDI Minerals Management Service and the Santa Barbara Museum of Natural History, Santa Barbara, California.

<sup>62</sup> Agenbroad, L. D., et al., 2005, Mammoths and Humans as Late Pleistocene Contemporaries on Santa Rosa Island. In *Proceedings of the Sixth California Islands Symposium* edited by D. Garcelon and C. Schwemm, pp. 3-7. National Park Service Technical Publication CHIS-05-01, Institute for Wildlife Studies, Arcata, California.

<sup>63</sup> Erlandson, J. M. 1994, *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

<sup>64</sup> Wallace, W. J., 1955, *A Suggested Chronology for Southern California Coastal Archaeology*. Southwestern Journal of Anthropology 11(3):214-230.

<sup>65</sup> Elsasser, A. B., 1978, Development of Regional Prehistoric Cultures. In *Handbook of Native American Indians*, Volume 8: California, pp. 37-57, edited by Robert F. Heizer. Smithsonian Institution, Washington.

possessions, suggest a fully developed concept of wealth. Warfare, territoriality, and wealth all point to incipient tribalism.

(ii) *Protohistory, AD 1542-1769*

The Protohistoric period is the time between initial contact and subsequent, tenuous and peripheral contact with a literate culture to the full establishment of a local literate culture. In the Southern California Coast culture area, the advent of protohistory is marked by the maritime explorations of Juan Rodriguez Cabrillo in AD 1542. During the following 227 years, direct contact between local indigenous people and Europeans was limited to occasional European visits by sea. Spanish exploration and the establishment of Spanish colonies in Mexico, including along the Baja California Peninsula, afforded opportunities for brief episodes of direct contact and for peripheral contact such as “down-the-line” or “neighbor-to-neighbor” exchange of information and goods.<sup>66</sup>

European artifacts, although rare, are found in protohistoric archaeological deposits<sup>67</sup> Glass trade beads are the most common. One example, albeit from farther north along the California coast, is that of China ceramic fragments from an AD 1595 Spanish shipwreck which were collected and reworked by the Coast Miwok for generations.<sup>68</sup> European diseases likely took a toll on indigenous populations during protohistory.<sup>69</sup> Historical documentation of local people and events began with the overland Portolá expedition in 1769 and the establishment of Spanish missions in the 1770s.

In 1542, when Cabrillo, leader of the first European exploration of the California coast, sailed his ships into the San Pedro and Santa Monica bays, a “great number of Indian villages” were observed:<sup>70</sup>

*Villages were situated all along the Pacific shore wherever fresh water was available from flowing springs or cañon streams. In this semi-arid land established villages were almost inevitable wherever there was a stretch of level land along the banks of the Los Angeles River and the few other streams within the county area. In the mountains, the cañons usually were too narrow to afford sites for villages; but settlement sites are to be found where the cañons open out and the land levels off.*

It is notable that the courses of the rivers of the Los Angeles Basin, prior to modern, artificial channelization, fluctuated horizontally as sediments built up, or were transported

<sup>66</sup> Lightfoot, K. G., and W. S. Simmons, 1998, *Culture contact in Protohistoric California: Social Contexts of Native and European Encounters*. Journal of California and Great Basin Anthropology 20(2): 138-170.

<sup>67</sup> King, C., 1978, Protohistoric and Historic Archaeology. In *Handbook of Native American Indians*, Volume 8: California, pp. 58-68, edited by Robert F. Heizer. Smithsonian Institution, Washington.

<sup>68</sup> Starr, K., 2005, *California: A History*. Modern Library, New York.

<sup>69</sup> Erlandson, J. M., and K. Bartoy, 1995, *Cabrillo, the Chumash, and Old World Diseases*. Journal of California and Great Basin Anthropology 17(2):153-173.

<sup>70</sup> Walker, E. F., 1951, *Five Prehistoric Archaeological Sites in Los Angeles County, California*. Southwest Museum, Los Angeles, California.

and shifted due to storm waters and, at their estuaries, tidal and wave forces. Prehistoric village site locations, hence, may correlate with former, pluvial river channels rather than with current channels. Prior to floods in 1824-1825, for example, the Los Angeles River emptied into Santa Monica Bay, not San Pedro Bay.<sup>71</sup>

(iii) *Ethnohistory, Early History, AD 1769-1847*

The Project Site is located in the heart of Gabrielino<sup>72</sup> tribal territory which, at the start of the Spanish Period, included the Los Angeles Basin and adjacent areas, and San Clemente, Santa Catalina, and San Nicolas islands. Their mainland territory extended from the San Fernando Valley and the San Gabriel Mountains in the north to Aliso Creek and the Santa Ana Mountains in the south, and from Mount Rubidoux in the east to Topanga Canyon in the west. This territory included mountain, foothill, prairie, coastal zones, and the islands, which offered a variety of resources to Gabrielino foragers.

There were possibly more than 100 mainland villages; and Spanish reports suggested village populations ranged from 50 to 200 people.<sup>73</sup> Prior to actual Spanish contact the Gabrielino population had been decimated by diseases, probably spread by early Spanish maritime explorers.<sup>74</sup> 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*, once situated at the current location of Rancho Los Feliz, about 3.5 miles northeast of the Project Site.

The Gabrielino relied on gathered wild plants and trapped or hunted animals<sup>75</sup> for food. Acorns and piñon nuts were food staples found only in the mountains and foothills. On the islands and coast, marine resources, especially shellfish, fish, and sea mammals, greatly supplemented terrestrial resources. Plants also provided building material and raw material for craft manufacturing such as basket making. Animal bone, skin, fur, and feathers were also used as raw material for craft manufacturing. Whale bones were sometimes used in building windbreaks and houses. Certain types of stone were quarried and asphaltum<sup>76</sup> was gathered for tool and container manufacturing, and for water-

<sup>71</sup> Johnston, B. E., 1962, *California's Gabrielino Indians*. Southwest Museum, Los Angeles.

<sup>72</sup> The Gabrielino (alternatively spelled Gabrieleño) are so called for their aggregation at the Mission San Gabriel Arcángel during the early Spanish Period. Currently, many Gabrielinos prefer the term Gabrielino-Tongva, or simply Tongva, or Kizh.

<sup>73</sup> Bean, L. J., and C. R. Smith, 1978, Gabrielino. In: *Handbook of North American Indians*, Vol. 8, California. Robert F. Heizer, ed., pp. 538-549. Smithsonian Institution, Washington.

<sup>74</sup> Tac, Pablo, Conversion de los San Luisenos de Alta California, Proceedings of the 23rd International Congress of Americanists, 1930.

<sup>75</sup> Plants were not domesticated and domesticated animals were limited to dogs. Archaeological data collected to date does not suggest that dogs were used for food.

<sup>76</sup> Asphaltum is a tar-like substance that washes ashore from natural, undersea oil seepages.

proofing boats. Santa Catalina Island provided abundant steatite<sup>77</sup> which was valued as a raw material for bowls and an array of other items, notably body ornaments.

The Gabrielino interaction sphere was considerably larger than their tribal territory *per se*.<sup>78</sup>

*With the possible exception of the Chumash [their westward neighbors], the Gabrielino were the wealthiest, most populous, and most powerful ethnic nationality in aboriginal southern California, their influence spreading as far north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California.*

The Gabrielino spoke several dialects of a Cupan language in the Takic family, and neighboring tribes to the north, east, and south also spoke languages in the Takic family.<sup>79</sup>

Spain established two Franciscan missions in Gabrielino tribal territory: Mission San Gabriel Arcángel, founded in 1771 in the north-central Los Angeles Basin, and Mission San Fernando Rey de España, founded 1797 in the north-central San Fernando Valley. Prior to aggregation at the missions, the Gabrielino settlement pattern included primary villages and secondary camps; both villages and camps were situated alongside fresh waterways or springs.

For the Gabrielino and other Native Americans, Euro-American exploration and settlement, and the Spanish mission system, meant disease, strife, capture, displacement, and population decline from first contact until the 20<sup>th</sup> century.<sup>80</sup>

During the Spanish and Mexican periods, from the time of the overland Portolá expedition until the culmination of the Mexican-American War, the Project Site was not far from the centers of population and commerce. El Pueblo de La Reina de Los Angeles, established in 1781, was about 5 miles to the southeast, and Mission San Gabriel was about 12 miles to the east.<sup>81</sup>

<sup>77</sup> A soft rock consisting largely of talc and also known as steatite.

<sup>78</sup> Bean, L. J., and C. R. Smith, 1978, Gabrielino. In: *Handbook of North American Indians*, Vol. 8, California. Robert F. Heizer, ed., pp. 538-549. Smithsonian Institution, Washington.

<sup>79</sup> Shipley, W. F., 1978, Native Languages of California. In *Handbook of North American Indians*, Vol. 8, California. Robert F. Heizer, ed., pp. 80-90. Smithsonian Institution, Washington.

<sup>80</sup> Castillo, E. D., 1978, The Impact of Euro-American Exploration and Settlement. In *Handbook of Native American Indians*, Volume 8: California, pp. 99-127, edited by Robert F. Heizer. Smithsonian Institution, Washington. Costo, R., and J. H. Costo, (editors), 1987, *The Missions of California: A Legacy of Genocide*. Indian Historian Press, San Francisco. McCawley, W., 1996, *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California.

<sup>81</sup> Beck, W. A., and Y. D. Haase, 1974, *Historical Atlas of California*. University of Oklahoma Press, Norman.

(iv) *CA-LAN-159 ("La Brea Woman")*

In 1914, the remains of La Brea Woman (or CA-LAN-159) were discovered at the La Brea Tar Pits approximately two miles southwest of the Project Site approximately six to nine feet below the ground surface.<sup>82</sup> Speculations have been made that La Brea Woman was between 25 to 30 years old at death, although her age has not been scientifically confirmed.<sup>83</sup> A number of resources included with the find consist of several bones of Pleistocene fauna, a mano, shell beads, and domestic dog remains from that time. The shell beads have been estimated to date an early Holocene age (i.e., 12,000 to 8,000 years before present).

Due to the relatively long history of urban development in the Project vicinity, the full extent and density of Gabrielino occupation of the Project area are unknown. However, the known presence of two villages nearby and CA-LAN-159, reveals that the region did have extended occupation by the Gabrielino and earlier prehistoric inhabitants.

(b) *Nineteenth Century Background*

In the beginning of the nineteenth century, Spaniards who had worked at the missions began to set up what would later be known as the Ranchos. During the Rancho era of California history, the state was divided into large parcels of land encompassing thousands of acres apiece and ruled over in a semi-feudal manner by men who had been deeded the land by the Spanish crown and, later, the Mexican government. In 1821 Mexico won independence from Spain and began to dismantle California's mission system. As the missions began to secularize, they were transformed into small towns and most Gabrielino were eventually marginalized on reservations or integrated into American society. Many American Californians married into the Rancho families, a development that would transform land ownership in Mexican California. By the time the United States annexed California after the Mexican-American War, many of the Rancho lands were already in the hands of Americans. Residential and commercial development of the immediate Project Site was underway by the late 19<sup>th</sup> century.

(c) *Archaeological Resources Identified within the Project Site and Vicinity*

Results of the cultural resources records search through the South Central Coastal Information Center (SCCIC) indicate that a total of 29 cultural resource studies have been conducted within a one-half mile radius of the Project Site. Apart from built historical resources, the SCCIC records search identified no known historic or prehistoric archaeological resources that have been recorded within a one-half mile radius of the Project Site.

<sup>82</sup> Heizer, R. F., DPR Site Form for CA-LAN-159, 1949. Record on file at the SCCIC.

<sup>83</sup> Kennedy, G.E, A Note on the Ontogenetic Age of the Rancho La Brea Hominid, Los Angeles, California, Bulletin, Southern California Academy of Sciences 88(3): 123-126, 1989.

A search of the Sacred Lands File through the California Native American Heritage Commission (NAHC) did not indicate any known Native American cultural resources within the Project Site.<sup>84</sup> Pursuant to NAHC suggested procedure, follow-up letters were sent via certified mail and via email on August 19, 2015 to the Native American individuals and organizations identified by the NAHC as being affiliated with the vicinity of the Project Site to request any additional information about Native American cultural resources that may be affected by the Project. On August 20, 2015, Mr. John Tommy Rosas from the Tongva Ancestral Territorial Tribal Nation replied via email. Mr. Rosas requested specific Project information including excavation depths/plans and lead agency contact information for further consultation regarding the Project. On September 8, 2015, PCR (currently ESA) replied via email and provided Mr. Rosas with excavation depths and the lead agency contact. Mr. Rosas' response is included as an attachment to the Archaeological and Paleontological Resources Assessment that is provided in Appendix D of this Draft EIR. In accordance with AB 52, the City provided the required notice and conducted additional Native American consultations which are discussed further in Section IV.M, *Tribal Cultural Resources*, of this Draft EIR. Pursuant to the City's AB 52 notification for the Project, representatives from the Fernandeño Tataviam Band of Mission Indians first requested, then withdrew their request for consultation.

### 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 cultural resources if it would:

***Threshold (a): Cause a substantial adverse change in the significance of an 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 dedicated cemeteries.***

In assessing the Project's potential impacts related to cultural resources in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G questions:

<sup>84</sup> Request for Sacred Lands File Search and Native American Contact List for the 6220 Yucca Street Project in the Hollywood Community, Los Angeles County, California. Prepared by Katy Sanchez, Associate Government Program Analyst, California Native American Heritage Commission, August 6, 2015.

### (1) Historical Resources

- 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; or
- 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; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

## b) Methodology

### (1) Historical Resources

Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or may otherwise impact any historic resource(s), and, if so, (2) a determination of whether the Project would result in a "substantial adverse change" in the significance of the identified resource or resources.<sup>85</sup>

A Historical Resources Assessment Report, and Historical Resources Peer Review Report included in Appendix D, were conducted by personnel that meet and exceed the Secretary of the Interior's Professional Qualification Standards in history, architectural history and historic architecture. The key steps taken in completing the Historical Resources Assessment Report, which serves as the basis for this section of the Draft EIR, are listed below.

- A review of the existing properties within the Project Site.
- A review of any previous evaluations of Project Site properties through historic survey or other official action.

<sup>85</sup> Pub. Res. Code § 21084.1; CEQA Guidelines § 15064.5

- Analysis and evaluation of any potential historical resources within a one block radius of the Project Site.
- Review of the required consideration of historical resources under CEQA.
- The following documents related to the Project Site's development were consulted:
  - Historic permits and assessor records for properties within the Project Site
  - Sanborn Fire Insurance maps
  - Historic photographs, aerial photos and local histories
  - California State Historical Resources Inventory for Los Angeles County
  - Department of Parks and Recreation Historical Resources Inventory Forms
  - Community Redevelopment Agency Historic Survey Matrix
  - SurveyLA Eligibility Requirements

## (2) Archaeological Resources and Human Remains

To address potential impacts associated with archaeological resources and human remains, the cultural resource records search conducted for the Project at the SCCIC at California State University, Fullerton included a review of all recorded archaeological resources within a one-half mile radius of the Project Site, as well as a review of cultural resource reports on file. Research from the following resources was also conducted for the Project: California Points of Historical Interest, California Historical Landmarks, the California Register, the National Register, and the California Historic Resources Inventory System listings. In addition, a SLF records search was commissioned through the NAHC and the NAHC also recommended that outreach to Native American tribal groups be conducted in addition to AB 52 tribal consultation. These records searches and consultation efforts indicate whether records exist of previously recorded archaeological resource within or near the Project Site. In order to understand the land use history of the Project Site, available Sanborn Maps, historic aerial imagery; and other technical studies were reviewed. An assessment of the Project Site's existing conditions indicated no exposed undisturbed ground surface, which prevents any detection of typical surface clues regarding the potential presence of archeological resources. Therefore, no archaeological field survey was undertaken.

The potential for the Project Site to contain buried archaeological resources was assessed based on the findings of the records searches (i.e., presence and proximity of known resources), tribal consultation, historic land use, previous disturbances, subsurface geological conditions, and the proposed excavation parameters for the Project.

### **c) Project Design Features**

No Project Design Features are proposed with regard to cultural resources and/or the protection of human remains.



## d) Analysis of Project Impacts

**Threshold (a): *Would the Project cause a substantial adverse change in the significance of a historical resources pursuant to Section 15064.5?***

### (1) Impacts to Resources Within the Project Site

#### (a) *Yucca Argyle Apartments, 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue*

The Yucca Argyle Apartment complex has poor integrity and does not meet the threshold for listing as a historical resource under any of the applicable federal, state, or local criteria, and is not considered a historical resource pursuant to CEQA.<sup>86</sup> Therefore, the Project would not have a significant impact on a historical resource with respect to the proposed removal of the Yucca Argyle Apartments, and no further evaluation is required for compliance with CEQA.

#### (b) *1765 and 1771 North Vista del Mar Avenue/ Vista del Mar/Carlos Historic District*

Due to substantial alterations that have materially impaired their integrity and significance, the residences at 1765 and 1771 North Vista del Mar Avenue do not meet the criteria for federal, State, or local eligibility either as individual resources or as contributors to the Vista del Mar/Carlos Historic District. Because the Project would result in the removal of these two highly altered, ineligible residences that do not contribute to the Vista del Mar/Carlos Historic District, the Project would not demolish, destroy, or alter any primary character-defining features of the Vista del Mar/Carlos Historic District that would qualify it for listing in the California Register or any other relevant historical resources lists. Therefore, pursuant to CEQA, demolition of the residences would not result in the removal of any key physical characteristics of the Vista del Mar/Carlos Historic District that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register. Accordingly, the Project would have no significant adverse direct impact on the Vista del Mar/Carlos Historic District or any contributing historical resources, or any other eligible historical resources with respect to the removal of 1765 and 1771 Vista del Mar Avenue.

### (2) Impacts to Resources in the Project Vicinity

Impacts were 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, which are identified in the Historical Resources Assessment Report (Chapter IV, Section A, Part 1) provided in Appendix D of this Draft EIR and described in Subsection 2, above. As shown and further evaluated in the Historical Resources Assessment Report (Chapter V, Section B, Part 3, Impacts Analysis Using Los Angeles CEQA Thresholds), there are

<sup>86</sup> See Appendix D, Historical Resource Assessment and Historical Resources Peer Review Report.

seven (7) historical resources in the Project vicinity identified above that would have views of the Project; however, changes to the setting caused by the Project would have no effect on the listing eligibility of these resources. Based upon survey and review of existing conditions, the predominant character within the Project vicinity is made up of mixed commercial low-rise to high-rise developments and residential single-family low-rise to multi-family high-rise developments of varying densities, heights, footprints and architectural styles that span from the 1900s to the 2000s, including two recent tower projects located adjacent to the Project Site.

As explained below, the Project would not alter the setting of the seven (7) historical resources located in the Project vicinity in a manner that would materially impair their historical significance or integrity. While the scale and massing of the Project would alter the visual context of nearby resources, such as the Vista Del Mar/Carlos Historic District, the site of the former Little Country Church of Hollywood, Capitol Records Building, Pantages Theatre, Hollywood Equitable Building, Hollywood Boulevard Commercial and Entertainment District, and the Hollywood Walk of Fame, the historic settings for these resources have already been altered by changes and redevelopment in the area after the period of significance of these resources, including, without limitation, the construction of the Yucca Argyle Apartments in 1953 and the Hollywood Freeway completed by the late 40s and early 50s to the northeast of the Project Site. The Project would not alter the contributing setting of any nearby historical resources and therefore would have no adverse impacts to resources in the Project vicinity.

(i) *Vista del Mar/Carlos Historic District*

The Project would have a less than significant indirect impact to the adjacent Vista del Mar/Carlos Historic District, which is considered an historical resource in this analysis because it has been determined eligible for listing in the National Register. Because the removal of the currently ineligible residences at 1765 and 1771 Vista del Mar Avenue would not result in the removal of any key physical characteristics of the district that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register, their removal would not result in a significant adverse material impact on the district, as the district would remain eligible after Project completion.

The Project includes a 20-story tower (Building 1) at the western portion of the Project Site, which is differentiated from the nearby Craftsman and Spanish Revival style contributors by its modern architectural style and contemporary materials. The scale of the tower of Building 1 is large in comparison to the one- and two-story heights of the Vista del Mar/Carlos Historic District contributors. However, a second building (Building 2) proposed by the Project is a three-story building that provides a transitional buffer between the large contemporary tower (Building 1) and the adjacent Vista del Mar/Carlos Historic District. Building 2 features a seven-foot setback at the second and third floors at the south elevation, which reduces the building's scale and massing at the street front to be more compatible with the adjacent Vista del Mar/Carlos Historic District contributors. Further, Building 2 incorporates features and elements of the contemporary Craftsman

style including the use of stucco and brick, hipped roofs with overhanging eaves, residential scaled fenestration, and a muted color scheme, to support compatibility with the Craftsman style contributors.

Though the Project would not directly impact and is not rehabilitating any historic buildings, the design of Building 2 aligns with Secretary of Interior Standards for Rehabilitation, Standard 9 because the adjacent new construction would not destroy any of the historic materials that characterize the Vista del Mar/Carlos Historic District.<sup>87</sup> The new construction would be differentiated from the old and would be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the District and its environment. The Project would also align with Standards 10 because, if removed in the future, the essential form and integrity of the existing Vista del Mar/Carlos Historic District would be unimpaired. The Project's alignment with Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation further substantiates the conclusion that the Project's impacts on the Vista del Mar/Carlos Historic District are less than significant under CEQA.

(ii) *Little Country Church of Hollywood*

Abutting the southern end of the Project Site is the Little Country Church of Hollywood (HCM No. 567), which was designated in 1992. Following the designation of the Little Country Church of Hollywood, the church was destroyed in a fire and no longer exists (burned remnants were removed from the site). However, the property remains listed as a HCM. While some of the landscaping may be original, the destruction of the church has left the site's integrity severely compromised. The property no longer retains the physical characteristics necessary to convey its historical significance. Even though the Project is directly adjacent to the Little Country Church of Hollywood property, it would not materially impact its already diminished integrity. As such, the Project would not result in the de-listing of the building, and no impact to the property would occur.

(iii) *Capitol Records Building*

The Capitol Records Building, a designated HCM, has a view of the Project Site. However, the Argyle House project, currently under construction at 6230 Yucca Street, would block the current views between the Capitol Records Building and the Project Site. While the Project Site is located across the street from the Capitol Records Building, the immediate surroundings of the Capitol Records Building on its immediate block would not be impacted. Furthermore, the Project would not block any of the Capitol Records Building's notable views along Vine Street or Hollywood Boulevard, and would minimally block non-focal views from the Hollywood Freeway. The aesthetics and visual resources analysis presented in Section IV.A, *Aesthetics*, of this Draft EIR, describes the Project's potential impairment of views of the Capitol Records Building in depth and recognizes the Project would not block any valued views of the Capitol Records Building. Additionally,

<sup>87</sup> U.S. Dept. of Interior, The Secretary of Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating and Reconstructing Historic Buildings (2017), at p. 76.

the Project would not have a significant direct impact or affect the integrity of location, design, materials, workmanship, feeling, association, or setting of the Capitol Records Building. The Project would not materially impair the integrity, immediate surroundings or significance of the Capital Records Building that would make the building ineligible for listing as a historical resource. Therefore, the Project would not have a significant indirect impact on this historical resource.

*(iv) Pantages Theatre, Hollywood Equitable Building,  
Hollywood Boulevard Commercial and Entertainment  
District, Hollywood Walk of Fame*

There are four historical resources with partial views of the Project Site: the Pantages Theatre (LAHCM No. 193), the Hollywood Equitable Building (LAHCM No. 1088), the Hollywood Boulevard Commercial and Entertainment District (National Register District), and the Hollywood Walk of Fame (LAHCM No. 194). The historic settings of these resources have previously been compromised by significant amounts of infill development over time. These historical resources also front onto Hollywood Boulevard, away from the Project Site. Focal views of these historical resources occur east and west along Hollywood Boulevard, where views are taken in conjunction with other contributors to the Hollywood Boulevard Commercial and Entertainment District. As such, the Project would have no significant impact on any significant views of these resources or their contextual setting. The Project would not materially impair the integrity of the Pantages Theatre or the Hollywood Equitable Building, both contributors to a National Register listed district and individually listed at the state and local levels. Both properties face away from the Project site towards Hollywood Boulevard. The Project is also located at a distance from these resources and separated from them by intervening development. The Project would not materially alter these buildings or their associated historic settings. Portions of the Hollywood Boulevard Commercial and Entertainment District, and the Hollywood Walk of Fame, would have partial views of the Project Site; however, the character of the built environment within these views has been continually altered over time and both the intervening built environment and the Project would not contribute to their eligibility for listing. Furthermore, the Project would not physically impact any contributors in the Hollywood Boulevard Commercial and Entertainment District's or adversely affect its historic significance or integrity. It's eligibility as a historic district would not be materially impaired by the Project and therefore the Project and would not have a significant substantial adverse change in the significance of these resources. Therefore, the Project would have no significant indirect impact on these four historical resources.

**As discussed above, the Project does not involve construction that would demolish or cause an adverse material change in the eligibility of any historical resources within the Project Site or reduce the integrity or significance of any historical resources adjacent to the Project Site or in the Project vicinity. All identified resources would maintain the same level of eligibility as historical resources with the Project in place. Therefore, the Project would not have significant impacts on historical resources in the Project vicinity.**

***Threshold (b): Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

The Project would include the demolition of the existing uses at the Project Site and the construction of up to two and-a-half levels of subterranean parking that would warrant excavation to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending down to approximately 40 feet below ground surface. As discussed above, no known historic archaeological or prehistoric archaeological resources have been identified within the Project Site or within a half-mile radius of the Project Site. Review of Sanborn Maps indicated that the residence of Albert G. Bartlett, the owner of Bartlett Sheet Music in downtown Los Angeles, was formerly located within the Project Site and was considered one of the finest of the era. According to historic aerial photography review, the Bartlett residence was razed between 1923 and 1948. Between 1952 and 1954, the three apartment buildings that currently exist within the Project Site were constructed in the former location of the Bartlett residence.<sup>88</sup> Since the apartment buildings do not have basements, there is potential that historic archaeological resources associated with the Bartlett residence (e.g. refuse pits, privies, structural remains, etc.) have been preserved below the foundations of the apartments and below the surface parking lot within the Project Site. The other two buildings that currently exist within the Project Site were constructed in 1918 (1765 North Vista del Mar Avenue) and 1920 (1765 North Vista del Mar Avenue) as single-family residences and have been significantly altered over the years.

Since the Project Site has the potential to retain buried resources associated with the Bartlett residence that have at least some potential of being historic or unique archeological resources, the potential to encounter such subsurface archaeological resources during the construction of the Project is considered moderate. **Due to this potential, impacts on archeological resources are considered significant prior to mitigation. Mitigation Measures MM-ARCH-1 through MM-ARCH-3 are therefore identified below to reduce potentially significant impacts to buried/unknown unique archaeological resources to a less than significant level.**

***Threshold (c): Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

As discussed in Chapter VI (subsection Impacts Found not to be Significant) and in the Initial Study (Appendix A), the Project would not result in the disturbance of any known human remains, including those interred outside of dedicated cemeteries. However, this does not preclude the existence of buried human remains that may be unexpectedly encountered during construction. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and Section 15064.5(e) of the California Code of Regulations. These regulations outline the

<sup>88</sup> NETR Online, Historic Aerial Photographs from 1952 and 1954, accessed online at [historicaerials.com](http://historicaerials.com), September 25, 2015

procedures to follow in the event of a human remains discovery in any location. These procedures 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, the Project would have a less than significant impact with respect to Threshold c. No further analysis is required.**

## e) Cumulative Impacts

### (1) Historical Resources

Cumulative impacts to historical resources evaluate whether impacts of the Project and related projects, when taken as a whole, would substantially diminish the number of historical resources within the same or similar context or property type. Impacts to historical resources, if any, tend to be site-specific. However, cumulative impacts would occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same style or property type as those within the Project Site.

Chapter III, *General Description of Environmental Setting*, of this Draft EIR provides a list of related projects that are planned or under construction in the Project area. Of the 137 related project sites, nineteen (19) may have historical resources located on the same site or may impact views of historical resources. These projects are summarized in **Table IV.C-2, Summary of Related Projects**.

The Project, together with related projects, would not significantly affect historical resources in the immediate vicinity cumulatively or involve resources that are examples of the same style or property type as those within the Project Site. Of the 19 related projects identified above, only three are located in the immediate vicinity of the Project Site. Related Project 5, the Argyle House project, is located across the street from the Project Site between Argyle Avenue and Vine Street and involves the construction of a new 16-story residential condominium. The Argyle House project would block secondary views of the Capitol Records Building at the intersection of Yucca and Argyle. However, the view from this intersection is not considered a valued vantage point. Views of the Capitol Records Building become available and primary as the viewer moves to the west along Yucca Street, away from the Project Site and the Argyle House project. Accordingly, the construction of the Argyle House project and the construction of the Project would not have any impact on protected views of the historic Capitol Records Building. Furthermore, views of the Capitol Records Tower Building would remain primary along Argyle Avenue and the Hollywood Freeway. Therefore, the two projects would not cumulatively alter primary views of a historical resource.

**TABLE IV.C-2  
SUMMARY OF RELATED PROJECTS**

<b>Related Project No.</b>	<b>Description</b>	<b>HCM or CHR Status Codes</b>
Related Project 4:	Sunset Bronson Studios, 5800 W. Sunset Boulevard. Location of the Executive Office Building, built in 1923, listed in the National Register	CHR Status Code 1S
Related Project 5:	Argyle House, 6230 Yucca Street. Construction of a new 16-story residential condominium that may impact the setting. No historical resources are being removed or altered as a part of this project.	N/A
Related Project 16:	Hotel Argyle, 1800 N. Argyle Avenue. Construction of a new 16-story hotel that may impact the setting. No historical resources are being removed or altered as a part of this project.	N/A
Related Project 19:	Hotel & Restaurant Project, 6381 W. Hollywood Boulevard. Location of the Security Trust and Savings Bank, built in 1920, and listed in the National Register and the California Register as a contributor to a district.	CRH Status Code 1D
Related Project 21:	Hollywood Center Studios, 6601 W. Romaine Street. Location of a Streamline Moderne style commercial building, built in 1937.	Appears eligible at the local level but has not been formally evaluated
Related Project 23:	Hudson Building, 6523 W. Hollywood Boulevard. Location of the Holly Cinema, built in 1920, and listed in the National Register and the California Register as a contributor to a district.	CHR Status Code 1D
Related Project 26:	Restaurant and Deli, 5500 W. Hollywood Boulevard. Location of a historic property built in 1928, Hollywood Western Building, which is individually eligible for the National Register and listed in the California Register.	CHR Status Code 2S2
Related Project 29:	Millennium Hollywood Mixed-Use Project, 1740 N. Vine Street. Location of a historic property built in 1956, Capitol Records Building.	HCM No. 857
Related Project 36	Columbia Square Mixed-Use, 6121 Sunset Boulevard. Location of Columbia Square, CBS, KNXT, built in 1937, which is eligible for listing in the National Register.	CHR Status Code 3S
Related Project 42:	Ametron, 1546 N. Argyle Avenue. Location of Famous Players-Lasky Studio Film Laboratory built in 1923, which appears individually eligible for listing in the California Register.	CHR Status Code 3CS

<b>Related Project No.</b>	<b>Description</b>	<b>HCM or CHR Status Codes</b>
Related Project 45:	Hollywood Palladium Residences Project, 6201 W. Sunset Boulevard. Location of a Hollywood Palladium built in 1940, which appears eligible for listing in National Register.	CHR Status Code 3S
Related Project 49:	6250 Sunset (Nickelodeon) Project, 6250 W. Sunset Boulevard. Location of a historic property built at 6230 Sunset Boulevard in 1938, Earl Carroll Theater, which appears eligible for local and State listing.	CHR Status Code 5S3, 3S
Related Project 53:	1717 Bronson Avenue Apartments, 1717 N. Bronson Avenue. Location of a historic property built in 1904, which appears individually eligible for listing in the National Register.	CHR Status Code 3S
Related Project 61:	Academy Square, 1341 Vine Street, Location of a historic property built in 1962 that was identified in a reconnaissance survey but not evaluated .	CHR Status Code 7R
Related Project 75:	Retail & Office Building, 6904 W Hollywood Boulevard. Built in 1920, the property is a contributor to Hollywood Boulevard Commercial and Entertainment District, a listed National Register District, that is also locally eligible.	CHR Status Code 5S1 and 1D
Related Project 78:	Apartments, 7046 W Hollywood Boulevard, Location of the Hollywood Professional building built in 1925, which is listed as HCM No. 876 on June 5, 2007 and contributor to Hollywood Blvd Commercial & Entertainment District, a listed National Register District that is also locally eligible.	CHR Status Codes 5S1 and 1D
Related Project 84:	John Anson Ford Theater, 2580 Cahuenga Boulevard. Location Hollywood Pilgrimage Memorial Monument erected in 1923 and listed as HCM No. 617 on July 25, 1999.	CHR Status Code 5S1
Related Project 117:	Hollywood & Wilcox, 6430-6440 W Hollywood Boulevard. Location of the Attie Building, which is one of 63 contributors to the Hollywood Boulevard Commercial and Entertainment District, a National Register District.	CHR Status Code 1D
Related Project 125:	Montecito Senior Housing, 6650 W Franklin Avenue. Location of "The Montecito," which is listed in the National Register and California Register, constructed in 1931 and currently operated as an affordable senior living facility.	CHR Status Code 1S

SOURCE: ESA 2019.

Two other related projects in the immediate vicinity of the Project include the 16-story Kimpton Everly Hotel at the northeast intersection of Yucca Street and Argyle Avenue,



and the Millennium Hollywood Mixed-Use Project southwest of the intersection of Yucca Street and Argyle Avenue. While construction of both the Argyle Hotel and Millennium Hollywood Mixed-Use Project are not demolishing or altering a historical resource, the projects anticipate introducing improvements with greater densities on their respective sites. While both of these projects may block views of the Capitol Records Building, they would not have a cumulative effect in conjunction with the Project because views of the Capitol Records Building from the Project Site do not involve view blockage from any valued vantage points and would be blocked by the Argyle House project, which are closer to the Capital Records Building, as discussed above. The cumulative impact on views of the Capitol Records Tower Building as a result of the Argyle Hotel and Millennium Hollywood Mixed-Use Project would not have any impact on the setting of the Capitol Records Building and would not involve any blockage of views of the building from any valued vantage points. Following implementation of the Project, adjacent historical resources would retain their eligibility for historic designation and the Project's contribution to cumulative impacts in light of the Yucca Street Condo, Hotel Argyle, and Millennium Hollywood Mixed-Use projects would not be cumulatively considerable. Accordingly, the cumulative impact of the Project on surrounding historical resources would be less than significant.

The other 16 related projects are located at minimum distances ranging from approximately 1,380 feet (Related Project 19, 6381 W. Hollywood Boulevard) to 5,905 feet (Related Project 21, 6601 W. Romaine Street) from the Project Site, isolated by intervening development and located in a number of locations of varying character and context. The change in visual character within the Hollywood Community, as further described in the Aesthetics/Visual Resources chapter of this Draft EIR, concluded the Project, in combination with related projects, would not block notable focal or panoramic views within the Hollywood Community. Additionally, no related projects involve resources that are examples of the early twentieth century residential architecture; instead, the majority of the historical resources being affected by the related projects are commercial properties.

Further, as previously stated, the Project would have a less-than-significant impact on historical resources. First, there are no direct impacts associated with the removal of the residences at 1765 and 1771 North Vista del Mar Avenue because they do not retain enough integrity to convey their significance as an example of early-twentieth century residences and their associations with the early development of Hollywood, or as contributors to the Vista del Mar/Carlos Historic District. These residences at 1765 and 1771 North Vista del Mar Avenue both fail to meet the criteria for federal, State, or local eligibility as individual historical resources. Furthermore, the Vista del Mar/Carlos Historic District would retain the same level of integrity and eligibility after Project completion. **Therefore, the Project would not result in a cumulatively considerable contribution to significant cumulative impacts, and its cumulative impact on historical resources would be less than significant.**

## (2) Archaeological Resources and Human Remains

Generally, impacts to archeological resources and human remains are project site-specific, and are not generally capable of having a cumulative effect. Nevertheless, many of the related projects identified in Chapter III, *General Description of Environmental Setting*, would require excavation and grading activities. These activities could potentially expose or damage potential archaeological resources or human remains, although such impacts would be unlikely to be cumulative in nature. Additionally, similar to the Project, the related projects are located in developed areas and on sites that have been previously disturbed. **Each related project would be required to comply with applicable regulatory requirements such as CEQA Guidelines Section 15064.5, PRC Section 21083.2, Health and Safety Code Section 7050.5, and PRC Section 5097.9. Further, to the extent impacts on archaeological resources and human remains from related projects may occur, because the Project's potential impacts to archaeological resources and human remains, would be less than significant, any contribution from the Project would not be cumulatively considerable. Cumulative impacts to archaeological resources and/or human remains associated with the Project would be less than significant.**

### f) Mitigation Measures

#### (1) Historical Resources

Project impacts regarding historical resources would be less than significant. Therefore, no mitigation measures are required.

#### (2) Archaeological Resources

The following mitigation measures are identified to reduce potentially significant impacts on buried/unknown archaeological resources to a less than significant level.

**MM-ARCH-1:** Prior to the issuance of a demolition permit, 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. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and 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, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event.

**MM-ARCH-2:** 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. An appropriate buffer area shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. 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 preservation in place is not feasible, treatment 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, such as the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

**MM-ARCH-3:** 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 of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project 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.

## **g) Level of Significance after Mitigation**

### **(1) Historical Resources**

Project-level and cumulative impacts with regard to historical resources would be less than significant without mitigation.

## (2) Archaeological Resources

With implementation of mitigation measures MM-ARCH-1 through MM-ARCH-3, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or Public Resources Code Section 21083.2. The implementation of the mitigation measures would provide for the appropriate treatment and/or preservation of resources if encountered. Potentially significant impacts to archaeological resources would be reduced to a less than significant level. Cumulative impacts would also be less than significant.

## (3) Human Remains

Project-level and cumulative impacts with regard to human remains would be less than significant without mitigation.

## **IV. Environmental Impact Analysis**

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### **D. Energy**

#### **1. Introduction**

This section provides the content and analysis required by Public Resources Code, Section 21100(b)(3) and described in Appendix F to the Guidelines for the Implementation of the California Environmental Quality Act (State CEQA Guidelines).<sup>1</sup> Public Resources Code Section 21100(b) and Section 15126.4 of the State 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 State 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 states 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.

In accordance with the intent of Appendix F of the State CEQA Guidelines, this Draft 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 (which can be found in Appendix E), potential impacts, and conservation measures. Information found herein, as well as other aspects of the Project's energy implications and infrastructure, are discussed in greater detail elsewhere in this Draft EIR, including in Chapter II, *Project Description*, and Sections IV.F, *Greenhouse Gas Emissions*; IV.L, *Transportation*; and IV.N.2, *Utilities and Service Systems – Energy Infrastructure*.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) Federal**

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The

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<sup>1</sup> 14 California Code of Regulations §§ 15000 et seq.

U.S. Congress has specified that CAFE 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.<sup>2</sup>

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by the United States Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (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.<sup>3</sup> The 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.<sup>4</sup>

## (2) State

### (a) *Senate Bill 1389*

Senate Bill (SB) 1389 (Public Resources Code 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 (Public Resources Code 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 Natural Gas Outlook, the Transportation Energy Demand Forecast, Alternative and Renewable Fuel and Vehicle Technology Program benefits updates, an update on trends in California’s sources of crude oil, an update on California’s nuclear plants, and other energy issues.

<sup>2</sup> For more information on the CAFE standards, refer to <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy>. Accessed April 2018.

<sup>3</sup> United States Environmental Protection Agency, 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, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BOT1.PDF?Dockey=P100BOT1.PDF>. Accessed April 2018.

<sup>4</sup> United States Environmental Protection Agency, 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, <https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed April 2018.

(b) *California's Renewables Portfolio Standard*

First established in 2002 under SB 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.<sup>5</sup> On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's RPS 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.<sup>6</sup> Refer to Section IV.F, *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.<sup>7</sup> The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting. Efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 national standards.<sup>8</sup> The 2019 Title 24 standards continue to improve upon the 2016 Title

<sup>5</sup> California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018, [http://www.cpuc.ca.gov/RPS\\_Homepage/](http://www.cpuc.ca.gov/RPS_Homepage/). Accessed April 2018.

<sup>6</sup> California Public Utilities Commission, RPS Program Overview, 2018, [http://www.cpuc.ca.gov/RPS\\_Overview/](http://www.cpuc.ca.gov/RPS_Overview/). Accessed April 2018.

<sup>7</sup> California Energy Commission, 2016 Building Energy Efficiency Standards, <http://www.energy.ca.gov/title24/2016standards/>. Accessed April 2018.

<sup>8</sup> California Energy Commission, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015, <http://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf>. Accessed April 2018.

24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 Title 24 standards go into effect on January 1, 2020.

(ii) *California Green Building Standards (Title 24, Part 11)*

The 2016 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. The 2016 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.<sup>9</sup> Most mandatory measure changes, when compared to the previously applicable 2013 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 nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety. The 2019 CALGreen Code improves upon the 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. The 2019 CALGreen Code goes into effect on January 1, 2020. Refer to Section IV.F, *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 fact that the transportation sector accounts for more than half of California's carbon dioxide (CO<sub>2</sub>) 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.<sup>10,11</sup> 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

<sup>9</sup> California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017, [https://codes.iccsafe.org/content/document/657?site\\_type=public](https://codes.iccsafe.org/content/document/657?site_type=public). Accessed April 2018.

<sup>10</sup> California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, <http://www.arb.ca.gov/cc/ccms/ccms.htm>, last reviewed January 11, 2017. Accessed April 2018.

<sup>11</sup> United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017–2025 Cars and Light Trucks, 2012, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF>. Accessed April 2018.



2026. California and 22 other states and environmental groups in September 2019 in U.S. District Court in Washington, filed lawsuits to challenge the Federal determination in September that California cannot set vehicle emission standards and zero-emission vehicle mandates. The Court has not yet ruled on the lawsuits. Refer to Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding this regulation.

(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 California Public Utilities Commission (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 state climate policies reach into disadvantaged communities. Refer to Section IV.F, *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.

(g) *Low Carbon Fuel Standard*

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020.<sup>12</sup> Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas and hydrogen.

<sup>12</sup> Office of the Governor, Executive Order S-01-07, January 18, 2007, <https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf>. Accessed October 18, 2018.

(h) *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.<sup>13</sup> 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 (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the Zero-Emissions Vehicle regulations (ZEV) 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 (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

(ii) *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*

In 2004, the 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.*

In addition to limiting exhaust from idling trucks, in 2008 CARB approved the Truck and Bus regulation to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> 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. 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 (hp) such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel-

<sup>13</sup> California Air Resources Board, Clean Car Standards – Pavley, Assembly Bill 1493, <https://www.arb.ca.gov/cc/ccms/ccms.htm>, last reviewed January 11, 2017. Accessed April 2018.

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 (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.

While the goals of these measures are primarily to reduce public health impacts from diesel emissions, compliance with the regulation has shown an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines.<sup>14</sup>

(i) *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. Under SB 375, each region's 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 must then be consistent with the SCS. Implementation of the SCS would have the co-benefits of reducing per capita vehicle miles traveled (VMT) and corresponding decreases in per capita transportation-related fuel consumption. However, SB 375 expressly provides that the SCS does not regulate local land use decisions, 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 the SCS. Refer to Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these requirements.

(j) *California Environmental Quality Act*

In accordance with California Environmental Quality Act (CEQA), including Public Resources Code, Section 21100(b)(3), and Appendix F, Energy Conservation, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing 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;

<sup>14</sup> Concrete Construction, Cummins Tier 4 Final Field-Test Programs Exceeds 140,000 Hours, May 6, 2014, [https://www.concreteconstruction.net/producers/cummins-tier-4-final-field-test-programs-exceeds-140-000-hours\\_c](https://www.concreteconstruction.net/producers/cummins-tier-4-final-field-test-programs-exceeds-140-000-hours_c). Accessed April 2018.

- 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), 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.<sup>15</sup>

#### (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. SCAG's first-ever SCS 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 that reduced per capita VMT (and resulted in corresponding decreases in per capita transportation-related fuel consumption) focused on transportation and land use planning that included building infill projects, locating residents closer to where they work and play, and designing communities so there would be access to high quality transit service. SCAG has since adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).<sup>16</sup> The goals and policies of the 2016-2040 RTP/SCS build from the previous 2012-2035 RTP/SCS and provide strategies for reducing per capita VMT, which results in corresponding decreases in per capita transportation-related fuel consumption. These major strategies include understanding how the region's population and demands are changing, focusing new growth in High Quality Transit Areas (HQTAs), developing a livable corridor network which includes investing in Complete Streets, providing options for short-trips, and supporting local sustainability planning. These strategies would locate a variety

<sup>15</sup> California Gas and Electric Utilities, 2018 California Gas Report, 2018.

<sup>16</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed October 18, 2018.

of land uses 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.<sup>17</sup> Refer to Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding the 2016-2040 RTP/SCS.

#### (4) Local

##### (a) *L.A.’s Green New Deal (Sustainable City pLAn 2019)*

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.<sup>18</sup> L.A.’s Green New Deal 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 tackles the climate emergency with accelerated targets and new aggressive goals.

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.

<sup>17</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, p.95, April 2016, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed October 18, 2018.

<sup>18</sup> City of Los Angeles. LA’s Green New Deal, 2019.

- 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).
- 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 is 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 2016 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 set forth in three categories of projects: (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. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. Refer to Section IV.F, *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 2017, 3.7 million tons of aluminum were produced by recycling in the United States, saving enough energy to provide electricity to 7.7 million

homes.<sup>19</sup> In 1989, California enacted Assembly Bill 939 (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 implementing its Solid Waste Integrated Resources Plan (SWIRP), also referred to as the City's Zero Waste Plan, whose goal is to lead Los Angeles 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.<sup>20</sup> The RENEW 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.<sup>21</sup> The City has also approved the Waste Hauler Permit Program (Ordinance No. 181519, Los Angeles Municipal Code (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, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

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).

<sup>19</sup> American Geosciences Institute, How Does Recycling Save Energy? <https://www.americangeosciences.org/critical-issues/faq/how-does-recycling-save-energy>. Accessed October 18, 2018.

<sup>20</sup> 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](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 May 2017.

<sup>21</sup> City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011, [http://clkrep.lacity.org/online/docs/2011/11-0973\\_MISC\\_06-07-11.pdf](http://clkrep.lacity.org/online/docs/2011/11-0973_MISC_06-07-11.pdf). Accessed March 2018.

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.

The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City of Los Angeles 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 the 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, the LADWP has a net dependable generation capacity greater than 7,531 MW.<sup>22</sup> On September 1, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,555 MW.<sup>23</sup> Approximately 30 percent of LADWP's 2017 electricity mix were from renewable sources, which is similar to the 29 percent statewide percentage of electricity purchases from renewable sources.<sup>24</sup> The annual electricity sale to customers for the 2016-2017 fiscal year was approximately 22,878 million kilowatt hours (kWh).<sup>25</sup>

## (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 from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network, and, therefore, resource availability is typically not an issue. Natural gas provides almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet (cf).

<sup>22</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Plan, p. 17, 2017, [https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased). Accessed June 2018.

<sup>23</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Plan, p. 17, 2017, [https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased). Accessed June 2018.

<sup>24</sup> California Energy Commission, Utility Annual Power Content Labels for 2017, Los Angeles Department of Water and Power, [https://ww2.energy.ca.gov/pcl/labels/2017\\_labels/LADWP\\_2017\\_PCL.pdf](https://ww2.energy.ca.gov/pcl/labels/2017_labels/LADWP_2017_PCL.pdf). Accessed June 2019.

<sup>25</sup> Los Angeles Department of Water and Power, 2017 Retail Electric Sales and Demand Forecast, p. 14, 2017, [http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retails%20Sales%20Forecast\\_Final.pdf](http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retails%20Sales%20Forecast_Final.pdf). Accessed March 2018.



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 Mexican border.<sup>26</sup>

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.<sup>27</sup> 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 the Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.<sup>28</sup> Gas supply available to SoCalGas from California sources averaged 122 million cubic feet (cf) per day in 2015 (the most recent year for which data are available).<sup>29</sup> The annual natural gas sale to customers in 2016 was approximately 304,290 million kilo British thermal units (kBtu).<sup>30</sup>

### (3) Transportation Energy

According to the CEC, transportation accounted for 38.5 percent of California's total energy consumption in 2015.<sup>31</sup> In 2016, California consumed 15.5 billion gallons of gasoline and 3.7 billion gallons of diesel fuel.<sup>32</sup> Petroleum-based gasoline and diesel fuels account for more than 90 percent of California's transportation fuel use, with alternative fuels such as biofuels, natural gas, hydrogen, and electricity accounting for the remaining 10 percent.<sup>33</sup> 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 vehicle efficiency, increase the development and use of

<sup>26</sup> SoCalGas, Company Profile, <http://www.socalgas.com/about-us/company-info.shtml>. Accessed April 2018.

<sup>27</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 80, 2018.

<sup>28</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 80-81, 2018.

<sup>29</sup> Ibid

<sup>30</sup> Sempra Energy, 2016 Annual Report, 2017, [http://www.annualreports.com/HostedData/AnnualReports/PDF/NYSE\\_SRE\\_2016.pdf](http://www.annualreports.com/HostedData/AnnualReports/PDF/NYSE_SRE_2016.pdf). Accessed March 2018. Converted from 294 billion cubic feet and a conversion factor of 1,035 Btu per cubic foot based on United States Energy Information Administration data (see: United States Energy Information Administration, Natural Gas, Heat Content of Natural Gas Consumed, March 30, 2018, [https://www.sempra.com/sites/default/files/microsites/2016\\_annualreport/](https://www.sempra.com/sites/default/files/microsites/2016_annualreport/). Accessed April 2018).

<sup>31</sup> California Energy Commission, Final 2017 Integrated Energy Policy Report Update, docketed April 16, 2018, p. 3, <https://efiling.energy.ca.gov/getdocument.aspx?tn=223205>. Accessed August 29, 2019. Based on the transportation sector accounting for 38.5 percent of the State's GHG emissions in 2015.

<sup>32</sup> California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2016, [http://www.energy.ca.gov/almanac/transportation\\_data/gasoline/2016\\_A15\\_Results.xlsx](http://www.energy.ca.gov/almanac/transportation_data/gasoline/2016_A15_Results.xlsx). Accessed April 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

<sup>33</sup> California Energy Commission, 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, May 2016, <http://www.energy.ca.gov/2015publications/CEC-600-2015-014/CEC-600-2015-014-CMF.pdf>. Accessed March 2018.

alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, total gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline through 2030, and there will be an increase in the use of alternative fuels.<sup>34</sup> According to fuel sales data from the CEC, fuel consumption in Los Angeles County was approximately 3.58 billion gallons of gasoline and 0.58 billion gallons of diesel fuel in 2016.<sup>35</sup>

#### (4) Project Site

The Project Site is currently developed with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings (43 existing multi-family/apartment units total) and associated carports and paved surface parking areas, for a total of 44 dwelling units. All of the existing features are to be demolished to allow for the development of the Project. The existing site uses currently energy demand for building electricity and natural gas and mobile source transportation fuel demand (e.g., gasoline and diesel). However, for the purposes of this analysis, the Project energy demand is conservatively considered to be new energy demand and the existing site energy is not subtracted from the Project's energy demand.

### 3. Project Impacts

#### a) Thresholds of Significance

Appendix G of the State CEQA Guidelines provides checklist items for the evaluation of impacts related to energy resources. In addition, Appendix F of the State CEQA Guidelines was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include the topics listed for consideration, to the extent applicable, and a detailed statement setting forth “[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.”

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.***

***Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.***

<sup>34</sup> California Energy Commission, Final 2017 Integrated Energy Policy Report Update, docketed April, 16, 2018, p. 212.

<sup>35</sup> California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2016. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

In accordance with Appendix F and Appendix G of the State CEQA Guidelines, the following factors are considered, and addressed individually below, in determining whether this threshold of significance is met:

- 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 effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In addition, with regard to Threshold (b), the following factors are considered:

- The degree to which the Project complies with existing energy standards;
- The degree to which the Project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.
- Whether the Project conflicts with adopted energy conservation plans.

## **b) Methodology**

This analysis assesses 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. Calculations are provided in Appendix E of this Draft EIR, and are based on the same assumptions as are used in Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR.

### **(1) Construction**

Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using the California Emissions Estimator Model (CalEEMod), consistent with the Project's air quality and GHG emissions calculations as discussed in Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR.<sup>36</sup> Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was assumed to be negligible. In terms of natural gas, construction activities typically do not involve the

<sup>36</sup> California Air Pollution Control Officers Association, California Emissions Estimator Model, 2017, <http://caleemod.com/>. Accessed March 2018.

consumption of natural gas. Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix C of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour from CARB's OFFROAD model. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC2017 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix E of this Draft EIR for detailed energy calculations.

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 has been estimated based on the number and type of construction equipment that would be used during Project construction, the extent that various equipment are utilized in terms of equipment operating hours or miles driven, and the estimated duration of construction activities based on information received from the applicant. Energy for construction worker commuting trips has been estimated based on the predicted number of workers for the various phases of construction and the estimated VMT based on CalEEMod modelling. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulatory requirements and incorporation of PDF-AQ-1 that would minimize the amount of energy usage during construction. These measures are also discussed in Chapter II, *Project Description*, Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR.

The construction equipment and haul trucks would likely be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment and haul trucks would be diesel-fueled. This represents a worst-case scenario intended to represent the 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 EMFAC emissions model, which is a state-approved model for estimating emissions on-road vehicles and trucks. Both OFFROAD and EMFAC are incorporated into the California Emissions Estimator Model (CalEEMod), which is a state-approved emissions model used for the Project's air quality and GHG emissions assessment. Therefore, this energy assessment is consistent with the modeling approach used for other environmental analyses in the EIR and consistent with general CEQA standards.

## (2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas from Project operation was calculated using demand factors provided in CalEEMod based on the 2016 Title 24 standards, which went into effect on January 1, 2017. The CEC estimated that the 2016 Title 24 standards are 28 percent more efficient than the 2013 Title 24 standards for residential construction and five percent more efficient for non-residential construction.<sup>37</sup>

Energy impacts associated with transportation during operation were also assessed. Energy demand due to the transportation of employees and visitors to and from the Project Site was estimated based on the estimated VMT obtained from the Project's VMT analysis in the CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California provided in Appendix L-1 of this Draft EIR.<sup>38</sup> Energy usage from water demand (e.g., electricity used to supply, convey, treat, and distribute) was estimated based on new buildings and facilities compared to the existing uses. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulations, its incorporation of PDF-AQ-1 and PDF-WS-1, and its land use transportation characteristics that would minimize the amount of energy usage during operations. These features and characteristics are also discussed in Chapter II, *Project Description*, Section IV.B, *Air Quality*, Section IV.F, *Greenhouse Gas Emissions*, Section IV.H, *Land Use and Planning*, and Section IV.N.1, *Utilities*, of this Draft EIR.

Based on the Project's annual operational VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon in EMFAC2017. The vehicle fleet mix for vehicles anticipated to visit the Project Site was calculated consistent with the CalEEMod default for the Project Site area in the South Coast Air Basin, which includes Los Angeles County. Supporting calculations are provided in Appendix E of this Draft EIR. These calculations were also used to determine if the Project would cause the wasteful, inefficient and/or unnecessary consumption of energy as required by Appendix F guidelines.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2021 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands.

Under CEQA, the existing environmental setting for an EIR is generally established at or around the time that the Notice of Preparation (NOP) for the EIR is published. As discussed previously, the Project Site is developed with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings. Within the

<sup>37</sup> California Energy Commission, 2016 Building Energy Efficiency Standards Adoption Hearing presentation, June 10, 2015. Accessed March 2018.

<sup>38</sup> Gibson Transportation Consulting, Inc., CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California. Provided in Appendix L-1 of this Draft EIR.

CalEEMod software, building electricity and natural gas usage rates were adjusted to account for prior Title 24 Building Energy Efficiency Standards.<sup>39</sup>

### c) Project Design Features

The following Project Design Features are incorporated into the Project:

**PDF-AQ-1: Green Building Measures:** The Project will be designed and operated to exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.

Green building measures will include, but are not limited to the following:

- The Project will be designed to optimize energy performance and reduce building energy cost by a minimum of 5 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016).
- The Project will be designed to optimize energy performance and reduce building energy cost by installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent.
- The Project will provide a minimum of 30 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the Project Site.
- The Project will reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption as required in LAMC Section 99.04.304. Reductions would be achieved through drought-tolerant/California native plant species selection, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), and/or smart irrigation systems (e.g., weather-based controls).
- The Project will reduce indoor potable water use by a minimum of 20 percent compared to baseline or standard water consumption as defined in LAMC Section 99.04.303 by installing water fixtures that exceed applicable standards.
- The Project would not include fireplaces in the residential buildings.

**PDF-WS-1:** Water conservation measures will include, but not be limited to: installation of waterless urinals; 1.75 gpm for shower heads; high efficient/demand water heater system; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible.

<sup>39</sup> California Air Resources Board, CalEEMod User's Guide, Appendix E, Section 5, September 2016. Available: [http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/06\\_appendix-e2016-3-1.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/06_appendix-e2016-3-1.pdf?sfvrsn=2). Accessed October 2017. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

## 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?***

The following analysis considers the topics identified under both Appendix F and Appendix G of the State CEQA Guidelines to determine whether this significance threshold would be exceeded.

- (1) 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 Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction and operations).

### (a) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, or other construction activities necessitating electrical power. As discussed below, construction activities typically do not involve the consumption of natural gas. 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 workers traveling 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).

As shown in **Table IV.D-1, Summary of Energy Use During Project Construction**, an annual average of 12,133 kWh of electricity, 34,836 gallons of gasoline, and 83,138 gallons of diesel fuel is estimated to be consumed during Project construction. Project construction is expected to be completed by 2021.

### (i) Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. 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, consistent with suggested measures in the

CEQA Thresholds Guide to use electricity from power poles rather than temporary gasoline or diesel-powered generators.

**TABLE IV.D-1**  
**SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION <sup>a</sup>**

Energy Type	Total Quantity <sup>c</sup>	Annual Average Quantity During Construction <sup>c</sup>
<b>Electricity</b>		
Water Consumption	22,243 kWh	12,133 kWh
Lighting, Electronic Equipment, Other	N/A <sup>b</sup>	N/A <sup>b</sup>
<b>Total Electricity</b>	<b>22,243 kWh</b>	<b>12,133 kWh</b>
<b>Gasoline</b>		
On-Road Construction Equipment	63,866 gallons	34,836 gallons
Off-Road Construction Equipment	0 gallons	0 gallons
<b>Total Gasoline</b>	<b>63,866 gallons</b>	<b>34,836 gallons</b>
<b>Diesel</b>		
On-Road Construction Equipment	100,000 gallons	54,545 gallons
Off-Road Construction Equipment	61,565 gallons	33,581 gallons
<b>Total Diesel</b>	<b>161,565 gallons</b>	<b>88,126 gallons</b>

kWh = kilowatt-hours; N/A = not available

<sup>a</sup> Detailed calculations are provided in Appendix E of this Draft EIR.

<sup>b</sup> Electricity usage associated with this line item would be very limited and small in scale.

<sup>c</sup> Totals may not add up due to rounding of decimals.

SOURCE: ESA, 2019.

As shown in Table IV.D-1, annual construction electricity usage would be approximately 12,133 kWh. As discussed below, this would be within the supply and service capabilities of LADWP.<sup>40</sup> 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 use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and utilized by lighting and electronic equipment that comply with applicable standards for energy efficiency (i.e., applicable requirements for high-efficiency lights, etc.). When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. **Therefore, construction of the project would not result in potentially**

<sup>40</sup> The percentage is derived by taking the annual average amount of electricity usage during the construction period (12,133 kWh) and dividing that number by the annual amount of electricity usage during operation (3,417,600 kWh excluding the 30 kW solar photovoltaics) to arrive at 0.36 percent.



**significant environmental impact due to wasteful, inefficient, or unnecessary consumption of electricity.**

(i) *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 be supplied to support Project construction activities and the existing natural gas demand at the Project Site would cease. **Therefore, construction of the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of natural gas.**

(ii) *Transportation Energy*

The petroleum-based fuel use summary provided above in Table IV.D-1 represents the amount of transportation energy that could potentially be consumed during Project construction based on the conservative set of assumptions, provided in Appendix E, of this Draft EIR. As shown, on- and off-road vehicles would consume an estimated total of 63,866 gallons of gasoline and approximately 161,565 gallons of diesel fuel throughout the Project's construction. Project construction would last for up to approximately 1.8 years; therefore, the annual average fuel consumption would be approximately 34,836 gallons of gasoline and approximately 88,126 gallons of diesel fuel per year of construction.

For comparison purposes, the fuel usage during Project construction would represent a increase of less than 0.001 percent of the 2016 annual on-road gasoline-related energy consumption and an increase of 0.015 percent of the 2016 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix E 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.<sup>41</sup> The Project would comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips 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 CAFE standards. Furthermore, as per PDF-NOI-1 in Section IV.I, *Noise*, of this Draft EIR, generators used during the construction process will be electric or solar powered. Replacing diesel-fueled construction equipment with electric-powered equipment would reduce diesel fuel combustion on the Project Site and have the co-benefit of reducing construction-related air pollutant and GHG emissions from diesel fuel combustion.

<sup>41</sup> BP Global, Oil reserves, 2018, <http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html>. Accessed June 2018.

Construction of the Project would utilize fuel-efficient equipment that complies with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation contained in Section 2485 of Title 13 of the California Code of Regulations, and fuel requirements contained in Section 93115 of Title 17 of the California Code of Regulations 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 these anti-idling and emissions regulations would also result in energy 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. 181519 (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 USGBC LEED Silver Certification level or its equivalent as discussed in PDF-AQ-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 available data, construction would utilize energy only for necessary on-site activities, vendor deliveries of construction materials and removal of demolition debris and soil 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 minimize the Project's construction-related energy use. **Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of transportation energy.**

(b) *Operation*

During operation of the Project, 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. As shown in **Table IV.D-2, Summary of Annual Energy Use During Project Operation**, the Project's energy demand would be approximately 3,417,600 kWh of electricity per year (excluding solar photovoltaics), 5,662,999 cf of natural gas per year, 188,726 gallons of gasoline per year, and 19,272 gallons of diesel fuel per year.

**TABLE IV.D-2**  
**SUMMARY OF ANNUAL ENERGY USE DURING PROJECT OPERATION <sup>a,b</sup>**

Energy Type	Annual Quantity
<b>Electricity</b>	
Proposed Project	3,417,600 kWh
Solar Photovoltaics (30 kW)	(47,478 kWh)
<b>Total Electricity (excluding solar photovoltaics)</b>	<b>3,417,600 kWh</b>
<b>Total Electricity (including solar photovoltaics)</b>	<b>3,370,122 kWh</b>
<b>Natural Gas</b>	
Proposed Project	5,662,999 cf
<b>Total Natural Gas</b>	<b>5,662,999 cf</b>
<b>Transportation</b>	
Gasoline	188,726 gallons
Diesel	19,272 gallons
<b>Total Transportation – Gasoline</b>	<b>188,726 gallons</b>
<b>Total Transportation – Diesel</b>	<b>19,272 gallons</b>

kWh = kilowatt-hours

cf = cubic feet

<sup>a</sup> Detailed calculations are provided in Appendix E of this Draft EIR.

<sup>b</sup> Project electricity and natural gas estimates assume compliance with applicable 2016 Title 24 and CALGreen requirements and implementation of PDF-AQ-1 in Section IV.B, *Air Quality*, and PDF-WS-1 in Section IV.N.1, *Utilities*, of this Draft EIR.

SOURCE: ESA, 2018.

*(i) Electricity*

As shown in Table IV.D-2, with compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, at buildout, the Project would result in a projected on-site demand for electricity totaling approximately 3,417,600 kWh per year. The Project would include a minimum of 30 kilowatts of photovoltaic panels on the Project Site, which are estimated to provide approximately 47,478 kWh of electricity per year based on region-specific data from the United States Department of Energy, National Renewable Energy Laboratory (NREL),<sup>42</sup> and would reduce the Project's grid-supplied annual electricity demand to approximately 3,370,122 kWh. In addition to compliance with CALGreen, the Project also incorporates PDF-AQ-1 (Green Building Features) as described in Section IV.B, *Air Quality*, of this Draft EIR, which includes building features such as installation of energy-efficient lighting, heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and use of materials and finishes that emit low

<sup>42</sup> U.S. Department of Energy, National Renewable Energy Laboratory, PVWatts Calculator, <http://pvwatts.nrel.gov/pvwatts.php>. Accessed March 2017.

quantities of volatile organic compounds (VOCs). In addition, the Project incorporates PDF-WS-1 (Water Conservation Features) as provided in Section IV.N.1, *Utilities*, of this Draft EIR, to minimize water demand. As shown therein, PDF-WS-1 includes the installation of low-flow and high efficiency showerheads, toilets, and waterless urinals; landscaping consisting of native and drought-tolerant plants; and water-efficient drip/subsurface irrigation and micro-spray.

LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020. LADWP's current sources include wind, solar, and geothermal sources. These sources accounted for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available, and represent the available off-site renewable sources of energy that would meet the Project's energy demand.<sup>43</sup>

As previously described, the Project incorporates a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand. **Therefore, operation of the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of electricity.**

#### (ii) *Natural Gas*

As reported in Table IV.D-2, with compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, at buildout, the Project is projected to generate an on-site demand for natural gas totaling approximately 5,662,999 cf per year. As discussed above, in addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen), the Project incorporates project design features to further reduce energy use. The Project incorporates PDF-AQ-1 (Green Building Features) as described in Section IV.B, *Air Quality*, of this Draft EIR, which includes building features such as installation of energy-efficient lighting, installation of insulation in sidewalls and roofs, sealing of potential sources of air leakage to reduce infiltration and exfiltration, and heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants. In addition, PDF-AQ-1 would not allow fireplaces in the residential buildings, which would eliminate natural gas combustion from that source.

As stated above, the Project's demand for natural gas is estimated to be 5,662,999 cf per year, or approximately 15,515 cf per day. As previously described, the Project incorporates a variety of energy conservation measures and features to reduce energy usage and minimize energy demand. **Therefore, with the incorporation of these measures and features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.**

<sup>43</sup> California Energy Commission, Utility Annual Power Content Labels for 2016, Los Angeles Department of Water and Power.

### (iii) *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's residential uses would be 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 Project's users broad mobility without the need to use passenger vehicles. A majority of the vehicle fleet that would be used by Project occupants and residents would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards. Annual VMT for the Project were estimated in the CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California provided in Appendix L-1 of this Draft EIR.<sup>44</sup>

As reported in Table IV.D-2, the Project's estimated petroleum-based fuel usage would be approximately 188,726 gallons of gasoline and 19,272 gallons of diesel per year, or a total of 207,998 gallons of petroleum-based fuels annually. Based on the California Energy Commission's *California Annual Retail Fuel Outlet Report*, Los Angeles County consumed 3,577,000,000 gallons of gasoline and 580,800,000 gallons of diesel fuel in 2016.<sup>45</sup> The Project would account for 0.005 percent of County gasoline consumption and 0.002 percent of County diesel consumption, therefore current supplies can cover expected Project fuel demand.

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.<sup>46</sup> The Project would comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips 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 CAFE standards.

The Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. As discussed in Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, the Project would represent an urban infill development, because it would be developed on a currently developed site in an urban area. In addition, it would provide a mixed-use development with increased density at a Project Site identified by the City as being within a Transit Priority Area that is located near existing off-site commercial and retail destinations and in proximity to existing public transit stops. As discussed in detail in

<sup>44</sup> Gibson Transportation Consulting, Inc., CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California. Provided in Appendix L-1 of this Draft EIR.

<sup>45</sup> California Energy Commission, California Annual Retail Fuel Outlet Report, 2016, [https://ww2.energy.ca.gov/almanac/transportation\\_data/gasoline/piira\\_retail\\_survey.html](https://ww2.energy.ca.gov/almanac/transportation_data/gasoline/piira_retail_survey.html). Accessed April 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

<sup>46</sup> BP Global, Oil reserves, 2018, <http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html>. Accessed June 2018.

Section IV.F, *Greenhouse Gas Emissions*, the Project's design and its characteristics would be consistent with and support the goals of the SCAG 2016-2040 RTP/SCS. The Project's mixed use design, its increase in density located on an infill site in a Transit Priority Area and a High Quality Transit Area and in close proximity to existing 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 that that the Project has been properly designed and located so that its development would achieve a reduction in VMT greater than the Hollywood Community Plan area average and better than the City and statewide averages. As discussed in Section IV.F, *Greenhouse Gas Emissions*, the California Air Pollution Control Officers Association (CAPCOA) has published guidance on mitigating or reducing emissions from land use development projects within its guidance document titled *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended GHG emission reduction strategies.<sup>47</sup> This guidance document was used to quantify an approximately 29 percent reduction in VMT due to the Project's location, land use characteristics and Project Design Features, as compared to the statewide and South Coast Air Basin averages, and this reduction is included in the transportation fuel demand for the Project's mobile sources.<sup>48</sup> Additional detailed information regarding how the Project's location, land use characteristics and Project Design Features are consistent with CAPCOA's recommended GHG emission reduction strategies is provided in Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR. Additionally, the Project design would provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations for a minimum of 5 percent of the parking spaces pursuant to the CALGreen Code and LAMC (also refer to PDF-GHG-3 in Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR).

Given this evidence, the Project would minimize operational transportation fuel demand consistent with State, regional, and City goals. **Therefore, for all these reasons, operation of the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of transportation energy resources.**

#### (c) *Summary of Energy Use Efficiencies*

Construction would require approximately 0.36 percent of the Project's operational electricity demand. Therefore, impacts on electricity supply associated with Project construction activities would be less than significant.

<sup>47</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, (2010), <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed January 2018.

<sup>48</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, (2010), <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed January 2018.

As discussed previously, natural gas would not be supplied to support Project construction activities; thus, there would be no expected demand generated by construction of the Project. Therefore, impacts on natural gas supply associated with Project construction activities would be less than significant.

As discussed previously, construction would utilize energy only for necessary on-site activities, vendor deliveries of construction materials, and removal of demolition debris and soil from the Project Site. Idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus minimize the Project's construction-related energy use. Therefore, construction of the Project would not result in potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy.

As discussed previously, the Project-related annual electricity demand of 3,417,600 kWh per year (excluding solar photovoltaics) would represent approximately 0.013 percent of LADWP's projected sales in 2021 and therefore would be within LADWP's projected electricity supplies. The Project incorporates a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand. Therefore, with the incorporation of these measures and features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

As discussed below, the Project would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas's planning area. The Project incorporates a variety of energy conservation measures and features to reduce energy usage and minimize energy demand. Therefore, with the incorporation of these measures and features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

As discussed previously, current supplies can cover expected Project transportation fuel demand. Furthermore, the Project would minimize operational transportation fuel demand consistent with State, regional, and City goals. **Therefore, for all these reasons, operation of the Project would not result in potentially significant environmental impact due to the wasteful, inefficient, and unnecessary consumption of energy.**

## (2) 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.<sup>49</sup> As discussed above in the

<sup>49</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, p. ES-25, 2017. "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"

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 29 percent of LADWP's overall energy mix in 2016, which is the most recent year for which data are available.<sup>50</sup> These represent the available off-site renewable sources of energy that would meet the Project's energy demand. LADWP has committed to providing an increasing percentage of its energy portfolio from renewable sources so as to exceed the Renewables Portfolio Standard requirements, by increasing to 50 percent by 2025 (5 years before the 2030 requirement), 55 percent by 2030, and 65 percent by 2036.<sup>51</sup> The Project would not conflict with LADWP's ability to procure the required amount of renewable energy.

With regard to on-site renewable energy sources, the Project would meet the applicable requirements of the Los Angeles Green Building Code and the 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. The Project's incorporation of a minimum of 30 kilowatts of photovoltaic panels on the Project Site is estimated to provide approximately 47,478 kWh of electricity per year, reducing the Project's grid-supplied electricity demand. However, due to the Project Site's location, other types of on-site 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.<sup>52</sup> Therefore, the Project would support renewable energy.

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. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.<sup>53</sup> According to the U.S. Energy Information Administration (EIA), the United States currently has approximately 90 years of natural gas reserves based on 2016 consumption.<sup>54</sup> Compliance with energy standards is

<sup>50</sup> California Energy Commission, Utility Annual Power Content Labels for 2016, Los Angeles Department of Water and Power.

<sup>51</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, p. ES-3, 2017.

<sup>52</sup> California Energy Commission, Wind Projects and Wind Resource Areas, 2018, <http://www.energy.ca.gov/maps/renewable/wind.html>. Accessed March 2018.

<sup>53</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 80, 2018.

<sup>54</sup> U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last?, last updated April 9, 2018, <https://www.eia.gov/tools/faqs/faq.php?id=58&t=8>. Accessed April 2018.



expected to result in more efficient use of natural gas (lower consumption) in future years.<sup>55</sup> Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

As stated earlier in the discussion under Threshold a) (1), 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.<sup>56</sup> The Project would comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips 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 CAFE standards. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply. In addition, please see the discussion under Threshold a) (2), above.

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 would not have a significant impact on energy resources.**

(3) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

As discussed in Section IV.F, *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. The Project would be generally consistent with the general land use designation, density, and building intensity outlined in the SCAG 2016-2040 RTP/SCS. Using data collected from local jurisdictions, including General Plans, SCAG categorized existing land uses into "land use types" and then classified sub-regions into one of three land use development categories: urban, compact, or standard. SCAG used each of these three categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.<sup>57</sup> As shown in Exhibit 13 of the SCAG 2016-2040 RTP/SCS, SCAG categorized the area surrounding the Project Site as an urban area, generally defined as an area where growth would be considered infill or redevelopment, supported by high levels of regional and local transit service, and where the majority of housing units

<sup>55</sup> California Energy Commission, 2017, [http://www.energy.ca.gov/renewables/tracking\\_progress/documents/energy\\_efficiency.pdf](http://www.energy.ca.gov/renewables/tracking_progress/documents/energy_efficiency.pdf). Accessed April 2018

<sup>56</sup> BP Global, Oil reserves, 2018, <http://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html>. Accessed April 2018.

<sup>57</sup> Southern California Association of Governments, 2016-2040 RTP/SCS, pp. 20-21, April 2016, <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed March 2018.

are multifamily and attached single family (townhome), which tend to consume less water and energy than the larger housing types found in greater proportion in less urban locations.<sup>58</sup> As shown in Exhibit 5.1 of the SCAG 2016-2040 RTP/SCS, the Project Site is also located within a High Quality Transit Area (HQTAs), 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”.<sup>59</sup> The 2016-2040 RTP/SCS encourages increasing the density of development with mixed use projects within HQTAs, to reduce VMT and trips.<sup>60</sup>

The Project would be consistent with SCAG’s land use types for the area and would encourage the use of alternative modes of transportation, which could result in a reduction in overall VMT. The Project Site is located at an infill location in the highly urbanized and generally built-out active regional center of Hollywood that contains a mix of existing commercial, hotel, studio/production, office, entertainment, and residential uses. The Project Site is located within an identified Transit Priority Area and is within a quarter-mile of multiple public transportation options, including Metro bus routes (e.g., 180/181, 217, 2/302, Dash Beachwood, Dash Hollywood) and the Metro Red Line, which provides convenient access to Downtown Los Angeles and connections to Koreatown, and more distant locations. The Project would also provide parking for bicycles on-site to encourage utilization of alternative mode of transportation.

As discussed briefly above and in greater detail in Section IV.F, *Greenhouse Gas Emissions*, the CAPCOA’s guidance document on mitigating or reducing emissions from land use development projects, entitled *Quantifying Greenhouse Gas Mitigation Measures*, provides emission reduction values for recommended GHG reduction strategies.<sup>61</sup> As the Project would result in increased density on the Project Site, would be located in a transportation efficient area, would result in increased land use diversity and mixed-uses on the Project Site by including different types of land uses near one another, would be located in an area that offers access to multiple existing nearby destinations including restaurant, bar, studio/production, office, entertainment, movie theater, and residential uses as well as high quality public transit stations and stops, and would include pedestrian access connectivity within the Project and to/from off-site destinations, the Project would achieve an approximately 29 percent reduction in VMT from its location and the land use characteristics discussed below as compared to the statewide and South Coast Air Basin averages. Detailed VMT reduction calculations using the CAPCOA methodologies are provided in Appendix G of this Draft EIR

<sup>58</sup> Southern California Association of Governments, 2016-2040 RTP/SCS Background Documentation, Exhibit 13 and page 42, April 2016, [http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS\\_SCSBackgroundDocumentation.pdf](http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf). Accessed March 2018.

<sup>59</sup> Southern California Association of Governments, 2016-2040 RTP/SCS, pp. 8, 77, April 2016, <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed July 2018.

<sup>60</sup> Southern California Association of Governments, 2016-2040 RTP/SCS, p. 154, April 2016, <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed July 2018.

<sup>61</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, (2010). Available: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed October 2017.

As a result, operation of the Project would encourage and result in reduced transportation energy, and provide residents, employees, and visitors with multiple convenient alternative transportation options. **Therefore, the Project encourages the use of efficient transportation energy use and efficient transportation alternatives.**

(4) Summary regarding Threshold (a)

**The Project would implement PDF-AQ-1 and PDF-WS-1 and other conservation measures related to water conservation, energy conservation, landscaping, and other features consistent with the City's Green New Deal, as well as Project Sustainability Features that go beyond those specified by regulations such as the City's Green Building Ordinance during construction and operation. In addition, the Project would support statewide efforts to improve transportation energy efficiency through compliance with CAFE fuel economy standards and the Pavley and Low Carbon Fuel standards, and is located in a High Quality Transit Area to achieve a reduction in VMT better than the City and statewide averages. Therefore, the Project would not result in potentially a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.**

***Threshold (b): Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

(1) The Degree to which the Project Complies 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 NHTSA 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.<sup>62</sup> The 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.<sup>63</sup> 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

<sup>62</sup> United States Environmental Protection Agency, 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, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100BOT1.PDF?Dockey=P100BOT1.PDF>. Accessed March 2018.

<sup>63</sup> United States Environmental Protection Agency, 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, <https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed March 2018.

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 Project operations, as reported in Table IV.D-2, would be minimized through incorporation of applicable 2016 Title 24 standards, applicable 2016 CALGreen requirements, and the Los Angeles Green Building Code. Furthermore, the Project incorporates energy-conservation measures beyond regulatory requirements, as specified in PDF-AQ-1 and PDF-WS-1, requiring, for example, that the Project be designed to meet the USGBC LEED Silver Certification by including energy performance optimization features such as reducing building energy cost by a minimum of 5 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. The Project's incorporation of a minimum of 30 kilowatts of photovoltaic panels on the Project Site is estimated to provide approximately 47,478 kWh of electricity per year, reducing the Project's grid-supplied electricity demand. The Project would also incorporate water conservation features, such as installing water fixtures that exceed applicable standards, and implementing water-efficient landscaping techniques, such as water-efficient irrigation systems and planting native and drought-tolerant plant species.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project 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.F, *Greenhouse Gas Emissions*, the Project's mixed use design, its increase in density located on an infill site in a Transit Priority Area and a High Quality Transit Area and in close proximity to existing high-quality transit stops, 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 that that the Project has been properly designed and located so that its development would achieve a reduction in VMT greater than the Hollywood Community Plan area average and better than the City and statewide averages. The Project design would also provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations for a minimum of 5 percent of the parking spaces pursuant to the CALGreen Code and LAMC (also refer to PDF-GHG-3 in Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR).

**Thus, based on the information above, construction and operation of the Project would comply with existing energy standards.**

- (2) The degree to which the Project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

The current City of LA Green Building Code requires compliance with the 2016 Title 24 standards and the CALGreen Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code). In addition to compliance with the City's Green Building Code, the Project would incorporate energy-conservation measures beyond City requirements as specified in PDF-AQ-1 and PDF-WS-1. The Project would be designed to meet the USGBC LEED Silver Certification by including such energy performance optimization features as reducing building energy cost by a minimum of 5 percent for new construction as compared to the Title 24 Building Energy Efficiency Standards (2016), reducing water use by 20 percent for indoor water and 20 percent for outdoor water from the baseline as defined in PDF-AQ-1, and installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent. The Project would also incorporate water conservation features, such as installing water fixtures that exceed applicable standards and implementing water-efficient landscaping techniques, water-efficient irrigation systems and planting native and drought-tolerant plant species. The Project's incorporation of a minimum of 30 kilowatts of photovoltaic panels on the Project Site is estimated to provide approximately 47,478 kWh of electricity per year, reducing the Project's grid-supplied electricity demand.

The City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan that goes beyond regulatory mandates, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With respect to transportation energy demand, as discussed above, the Project would represent an urban infill development, since it would be undertaken on a currently developed site in an urban area. In addition, it would provide a mixed-use development with increased density at a Project Site identified by the City as being within a Transit Priority Area and High Quality Transit Area that is located near existing off-site commercial and retail destinations and in close proximity to existing public transit stops. In addition, the Project would result in increased density on the Project Site, would be located in a transportation efficient area, would result in increased land use diversity and

mixed uses on the Project Site by including different types of land uses near one another, would be located in an area that offers access to multiple existing nearby destinations including restaurant, bar, studio/production, office, entertainment, movie theater, and residential uses as well as high quality public transit stations and stops, and would include pedestrian access connectivity within the Project and to/from off-site destinations. These land use characteristics would minimize VMT and are included in the transportation fuel demand for the Project's mobile sources. Additional detailed information regarding these land use characteristics are provided in Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*.

**With implementation of these features along with complying with State and local energy efficiency standards, the Project would exceed applicable energy conservation policies and regulations beyond City requirements.**

(3) Whether the Project conflicts with adopted energy conservation plans.

A detailed discussion of the Project's consistency with the City's Green New Deal is provided in Section IV.F, *Greenhouse Gas Emissions*. The analysis describes the consistency of the Project with applicable plan goals and actions of state and local plans for energy efficiency. As discussed, the Project is designed in a manner that is consistent 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 2016 Title 24 standards and CALGreen Code, which have been incorporated into the City of Los Angeles Green Building Code as amended by the City, to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code). In addition to compliance with the City's Green Building Code, the Project would incorporate energy and water conservation measures beyond City requirements as specified in PDF-AQ-1 and PDF-WS-1 and discussed above. The Project would also incorporate of a minimum of 30 kilowatts of photovoltaic panels on the Project Site, which are estimated to provide approximately 47,478 kWh of electricity per year, reducing the Project's grid-supplied electricity demand.

The Project would also be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.F, *Greenhouse Gas Emissions*, as well as Section IV.H, *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, its increase in density located on an infill site in a Transit Priority Area and a High Quality Transit Area and in close proximity to existing high-quality transit, including the Metro Red Line and multiple bus routes, its close

proximity to existing 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 designed and located so that its development would achieve a reduction in VMT greater than the Hollywood Community Plan area average and better than the City and statewide averages. These land use characteristics would minimize the Project's VMT and are included in the transportation fuel demand for the Project's mobile sources. Additional detailed information regarding these land use characteristics are provided in Section IV.B, *Air Quality*, Section IV.F, *Greenhouse Gas Emissions*, and Section IV.L, *Transportation*.

When implemented, the following planned City actions, as presented in the City's Green New Deal, may further decrease energy consumption from the Project. These actions are not under the control of the Project; however, they would nonetheless further reduce Project-related energy use from non-renewable sources:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency;
- Change transportation and land use patterns to reduce dependence on automobiles;
- Decreasing emissions from LADWP electrical generation and import activities; and
- Expanding the regional rail network to reduce VMT.

As a result, the Project would implement Project Design Features and incorporate water conservation, energy conservation, landscaping, and other features consistent with the City's Green New Deal, as well as Project Sustainability Features that go beyond those specified by regulations such as the City's Green Building Ordinance. Therefore, the Project would not conflict with energy conservation plans and impacts would be less than significant.

## **e) Cumulative Impacts**

### **(1) Significance Threshold a): Wasteful, Inefficient and Unnecessary use of Energy**

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As presented in Section III, Environmental Setting, of this Draft EIR, the City has identified 137 related projects located within the vicinity of the Project Site. 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 is 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, it is meaningful to consider the Project in the context of County-wide

consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy.

(a) *Electricity*

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies. As stated above, to generate its electricity load forecast, 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.<sup>64</sup> 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.<sup>65</sup> Thus, LADWP forecasts that its total energy sales in the 2021-2022 fiscal year (the Project buildout year) will be 26,835 GWh of electricity.<sup>66,67</sup> As stated above, based on the Project's estimated electrical consumption of 3,417,600 kWh/year (excluding the 30 kW solar photovoltaics), the Project would account for approximately 0.013 percent of LADWP's total projected sales for the Project's buildout year. The Project would include a minimum of 30 kilowatts of photovoltaic panels on the Project Site, which are estimated to provide approximately 47,478 kWh of electricity per year and would reduce the Project's grid-supplied electricity demand to approximately 3,370,122 kWh. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could affect future availability, the Project's use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. The Project would also incorporate additional energy efficiency measures outlined in PDF-AQ-1 and PDF-WS-1 (refer to Section IV.B, *Air Quality*, and Section IV.N.1, *Utilities*, of this Draft EIR). Furthermore, as with the Project, during construction and operation, the related projects would be expected to incorporate energy conservation features, comply with applicable regulations including the 2016 Title 24 standards and CALGreen code, and incorporate mitigation measures, as necessary. **As such, the Project's impacts related to wasteful, inefficient or unnecessary use of electricity would not be cumulatively**

<sup>64</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, p. 70, 2017.

<sup>65</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, p. 67, 2017.

<sup>66</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

<sup>67</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1, 2017.



**considerable and, thus, the Project would not have a significant cumulative impact on electricity.**

*(b) Natural Gas*

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies. As stated above, based on the 2018 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf per day in 2022 (the Project's buildout year).<sup>68</sup> The Project would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas' planning area. As stated above, SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and since the Project's growth and development are consistent with those projections. Although Project development would result in the use of natural gas resources, which could affect future availability, the use of such resources would be on a relatively small scale. The Project's use of natural gas resources would be reduced by measures rendering the Project more energy-efficient and would fall within SoCalGas' consumption forecasts, and would be consistent with regional and local growth expectations for SoCalGas' service area. The Project would also incorporate additional energy efficiency measures outlined in PDF-AQ-1 (refer to Section IV.B, *Air Quality*, of this Draft EIR). Furthermore, the related projects would be expected to incorporate energy conservation features, comply with applicable regulations including the 2016 Title 24 standards and CALGreen code, and incorporate mitigation measures, as necessary. **As such, the Project's impacts related to wasteful, inefficient or unnecessary use of natural gas would not be cumulatively considerable, and thus the Project would not have a significant cumulative impact on natural gas.**

*(c) Transportation Energy*

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the State and region. As described above, at buildout, the Project would consume a total of 188,726 gallons of gasoline and 19,272 gallons of diesel per year, or a total of 207,998 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.005 percent of the 2016 annual on-road gasoline- and 0.002 percent of the annual on-road diesel-related energy consumption in Los Angeles County, as shown in Appendix E, 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

<sup>68</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 102, 2018.

from the transportation sector, and reduce vehicle miles traveled which would reduce reliance on petroleum fuels.

The Project would be consistent with the energy efficiency policies emphasized by the 2016-2040 RTP/SCS. As discussed previously, the Project would be consistent with SCAG's land use type for the area and would encourage alternative transportation and a reduction in overall VMT. The Project Site is located at an infill location in the highly urbanized and generally built out active regional center of Hollywood near a mix of existing commercial, hotel, studio/production, office, entertainment, and residential uses, and within an identified Transit Priority Area that is within a quarter-mile of multiple public transportation options, including Metro bus routes (e.g., 180/181, 217, 2/302, Dash Beachwood, Dash Hollywood) and the Metro Red Line, which provides convenient access to Downtown Los Angeles and connections to Koreatown, Hollywood and North Hollywood. Therefore, operation of the Project would provide residents, employees, and visitors with alternative transportation options and the implementation of construction features would minimize traffic flow congestion and reduce idling times and construction transportation fuel use. By its very nature, the 2016-2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Furthermore, as with the Project, the related projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions consistent with applicable provisions of the SCAG 2016-2040 RTP/SCS for the land use type. **For the reasons stated above, the Project's impacts related to wasteful, inefficient or unnecessary use of transportation fuel would not be cumulatively considerable, and thus the Project would not have a significant cumulative impact on transportation energy.**

(d) *Conclusion Regarding Threshold a)*

Based on the analysis provided above, the Project's impacts related to the wasteful, inefficient, or unnecessary consumption of energy (i.e., electricity, natural gas, and transportation energy) would not be cumulatively considerable during construction or operation. **As such, the Project's impacts would not be cumulatively considerable; therefore, the Project would not have significant cumulative energy impacts under Significance Threshold a).**

(2) Significance Threshold b): State or Local Plan Analysis

(a) *Electricity*

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies. However, as discussed above, LADWP and the CEC account for increases in demand based on various economic, population, and efficiency factors. As stated above, to generate its electricity load forecast, 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.<sup>69</sup> 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.<sup>70</sup>

Moreover, the Project would also incorporate energy efficiency measures (refer to Section IV.F, *Greenhouse Gas Emissions*, and Section IV.N. *Utilities*, 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 2016 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, 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 considered together with related projects would not result in cumulatively significant impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency and, thus, the Project would not have a cumulatively significant impact on electricity.**

(b) *Natural Gas*

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies. 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 would also incorporate additional energy efficiency measures outlined in (refer to Section IV.F, *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 2016 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

<sup>69</sup> LADWP, 2017 Power Strategic Long-Term Resource Plan, page 70.

<sup>70</sup> LADWP, 2017 Power Strategic Long-Term Resource Plan, page 67.

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 considered together with related projects would not result in cumulatively significant impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency and, thus, the Project would not have a cumulatively significant impact on natural gas.**

*(c) Transportation Energy*

Buildout of the Project, 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 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 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 conflict with the energy efficiency policies emphasized by the 2016 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 RTP/SCS for the land use type.

**For the reasons stated above, the Project considered together with related projects would not result in cumulatively significant impacts related to conflicting with or obstruction of a state or local plan for transportation energy efficiency.**

*(d) Conclusion Regarding Threshold b)*

Based on the analysis provided above, the Project's impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively significant during construction or operation. **As such, the Project considered together with related projects, would not result in cumulatively significant impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency under Significance Threshold b).**

### **f) Mitigation Measures**

Project impacts with regard to energy demand would be less than significant. Therefore, no mitigation measures are required.

### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts related to energy demand would be less than significant without mitigation.

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## IV. Environmental Impact Analysis

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### E. Geology and Soils

#### 1. Introduction

This section identifies existing geologic and soils, conditions and hazards associated with the Project Site and in the vicinity of the Project Site, including fault rupture, seismic ground shaking, liquefaction, expansive soils, and landform/landslide, and the Project's potential impacts related thereto. All geotechnical reports referenced in this section are included Appendix F of this Draft EIR. This section is largely based on information and findings gathered as part of the *Updated Geotechnical Feasibility Report for Proposed High-Rise Residential Development 6220 West Yucca Street, Hollywood District, Los Angeles, California* ("Geotechnical Feasibility Report"), prepared by Group Delta Consultants, Inc., dated March 2019, and provided in Appendix F-1, of this Draft EIR. The Geotechnical Feasibility Report was approved by the City in its approval letter dated October 24, 2019. The geotechnical report includes geologic findings for both the 6220 West Yucca and the 1765 West Vista Del Mar sites. As such, all the parcels incorporating the Project Site have been subject to geological investigation.

The Geotechnical Feasibility Report summarizes the findings of three prior reports, including *Supplemental Geologic Lot Evaluation, 1765 N. Vista Del Mar Avenue, Los Angeles, California*, prepared by Group Delta Consultants, Inc., dated April 10, 2015 (Appendix F-2) (including the parcels within the Project Site fronting Vista Del Mar Avenue); *Fault Activity Investigation for 1800 Argyle Avenue, Los Angeles, California*, prepared by Group Delta Consultants, Inc., dated November 10, 2014 (Appendix F-3); and *Fault Activity Investigation for Yucca-Argyle Apartments, Champion Site, 1756 and 1760 Argyle Avenue, Los Angeles, California*, prepared by Group Delta Consultants, Inc., dated September 7, 2014 (Appendix F-4). The two fault activity investigation reports were approved by the City by its approval letter dated February 20, 2015. The supplemental report, dated April 10, 2015, was approved by the City by its approval letter dated April 23, 2015. Appendix A of the Geotechnical Feasibility Report contains both City approval letters. In addition, the supplemental report considers the findings of the *Fault Activity Investigation for East and West Millennium Sites, 1733-1741 Argyle Avenue; 6236 and 6334 West Yucca Street; 1720-1730, 1740, 1745-1760 N. Vine Street; 1746, 1748-1754, 1760, and 1764 N. Ivar Avenue, Los Angeles, California*, prepared by Group Delta Consultants, dated March 6, 2015.

## 2. Environmental Setting

### a) Regulatory Framework

#### (1) State of California

##### (a) *Alquist-Priolo Earthquake Fault Zoning Act*

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621) was enacted by the State of California in 1972 to address the hazard of surface faulting to structures for human occupancy.<sup>1</sup> The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Geologic Survey's (CGS) Special Publication (SP) 42, *Fault-rupture Hazard Zones in California*.<sup>2</sup> 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 prevent the construction of buildings intended for human occupancy on the surface traces of active faults. The Alquist-Priolo Earthquake Fault Zoning Act is also intended to provide the public with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings against ground shaking.

The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory "earthquake fault zones" around the surface traces of active faults and to issue appropriate maps to assist cities and counties in carrying out their planning, zoning, and building regulation functions. Maps are distributed to all affected cities and counties to assist them in regulating new construction and renovations. These maps are required to sufficiently 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 from it. Although setback distances may vary, a minimum 50-foot setback is generally required. The Alquist-Priolo Earthquake Fault Zoning Act and

<sup>1</sup> The Act was originally entitled the Alquist-Priolo Geologic Hazards Zone Act.

<sup>2</sup> Hart, E.W., *Fault-Rupture Hazard Zones in California: Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps*, Department of Conservation, California Geological Survey, Special Publication 42, 1990, interim revision 2007. Available at <https://www.scribd.com/document/220767421/Special-Publication-42>. Accessed June 26, 2019.



its regulations are presented in California Geologic Survey's (CGS) Special Publication (SP) 42, Fault-rupture Hazard Zones in California (2007).<sup>3</sup>

The Project Site is located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault, as shown on Figure IV.E-2.

*(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 (Public Resources Code Section 2690-2699). Under the Seismic Hazards Mapping Act, the State Geologist is required 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" as defined in the Act,<sup>4</sup> 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 Public Resources Code 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 Public Resources Code 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 the CGS SP 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California,<sup>5</sup> discussed above, and SP 118, Recommended Criteria for Delineating Seismic Hazard Zones in California (2004).<sup>6</sup> 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

<sup>3</sup> Hart, Department of Conservation, California Geological Survey, Special Publication 42, Op Cit.

<sup>4</sup> As used in the Act, mitigation means "measures that are consistent with established practice and that will reduce seismic risk to acceptable levels." (Public Resources Code Section 2693 (c).)

<sup>5</sup> California Department of Conservation. Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, prepared by California Geologic Survey, 2008, <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>. Accessed August 27, 2019.

<sup>6</sup> California Department of Conservation. Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California, dated May 1992, Revised April 2004, [https://www.conservation.ca.gov/cgs/Documents/Program-SHP/SP\\_118.pdf](https://www.conservation.ca.gov/cgs/Documents/Program-SHP/SP_118.pdf). Accessed August 27, 2019.

Mapping Act.<sup>7</sup> SP 118 provides recommendations to assist the CGS in carrying out the requirements of the Seismic Hazards Mapping Act to produce the Probabilistic Seismic Hazard Maps for the State. The Project Site is not located within a Preliminary Fault Rupture Study Area.<sup>8</sup>

(c) *California Building Code*

The 2016 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 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 2016 edition of the CBC became effective on January 1, 2017, and incorporates by adoption the 2015 edition of the International Building Code of the International Code Council, with California amendments. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to reduce losses from an earthquake and provide for the latest in earthquake safety. The current (2016) 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) *California Environmental Quality Act*

Unique paleontological resources are afforded protection under CEQA. Appendix G (part V) of the *CEQA Guidelines* provides checklist questions relative to a project's potential impacts on paleontological resources, asking if "the project would...directly or indirectly destroy a unique paleontological resource or site or unique geologic feature." The *Guidelines* do not define "directly or indirectly destroy," but it can be reasonably interpreted as the physical damage, alteration, disturbance, or destruction of a paleontological resource. The *Guidelines* also do not define the criteria or process to determine whether a paleontological resource or site or geologic feature is significant or "unique."

<sup>7</sup> California Department of Conservation. Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, prepared by California Geologic Survey, 2008, <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>. Accessed August 27, 2019.

<sup>8</sup> City of Los Angeles Zimas website parcel information for 6220 Yucca Street, available at: <http://zimas.lacity.org/>, parcel information for 6220 Yucca Street. Accessed October 20, 2018.

(e) *Other State Regulations*

California Code of Regulations, Title 14, Division 3, Chapter 1, Section 4307 states in part that “A person shall not knowingly and willingly excavate upon, or remove, destroy, injure, or deface any . . . paleontological... feature.” California Public Resources Code Section 5097.5 protects cultural resources on public lands and provides that any unauthorized removal of paleontological feature is a misdemeanor. California Penal Code Section 622½ states that damage or removal of archaeological or historical resources (which may be interpreted to include paleontological resources) on public or private land constitutes a misdemeanor.

(f) *Society for Vertebrate Paleontology Guidelines*

The Society of Vertebrate Paleontology (SVP) is a private organization that has established guidelines, known as “Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources,” for the identification, assessment, and mitigation of adverse impacts on nonrenewable paleontological resources (SVP,2010).<sup>9</sup> Most practicing paleontologists in the nation adhere closely to the SVP’s assessment, mitigation, and monitoring requirements outlined in these guidelines, which were approved through a consensus of professional paleontologists and are the standard. The SVP outlined criteria for screening the paleontological potential of rock units (High, Undetermined, Low) and established assessment and mitigation procedures tailored to such potential.

(2) *City of Los Angeles*

(a) *Los Angeles General Plan Safety Element*

The City’s General Plan Safety Element (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, Public Resources Code Section 2699 requires that a general plan safety element take into account available seismic hazard maps prepared by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act. Public Resources Code Section 2696 requires that the State Geologist map active faults throughout the State. The Safety Element states that those maps which are applicable to the City of Los Angeles 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

<sup>9</sup> SVP, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010. Available at: [http://vertpaleo.org/The-Society/Governance-Documents/SVP\\_Impact\\_Mitigation\\_Guidelines.aspx](http://vertpaleo.org/The-Society/Governance-Documents/SVP_Impact_Mitigation_Guidelines.aspx).

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) Department 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 Safety Element acknowledges that it was based on available official maps at the time it was adopted in 1996 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.<sup>10</sup> This map is the State of California’s official earthquake fault zone map for the Hollywood area and is the most current and accurate map available to delineate the boundaries of earthquake fault zones in the Hollywood area.<sup>11</sup> 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.

*(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 these 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. Grading permits are required for all grading projects other than those specifically exempted by the LAMC. The function of City’s Building Code is to protect life safety and compliance with the LAMC. The sections of 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, Section 91.1803 includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. Specifically, Section 91.7006 requires that a Final Geotechnical Report with final design recommendations prepared by a California-registered geotechnical engineer be 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

<sup>10</sup> California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, November 2014. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/E03.pdf>. Accessed June 2019.

<sup>11</sup> California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, November 2014, Note 2.

foundation systems that may be suitable would be addressed in the Final Geotechnical Report.

(c) *City of Los Angeles General Plan Conservation Element*

The City's General Plan Conservation Element, Chapter II, Section 3,<sup>12</sup> protects endangered paleontologic sites by iterating CEQA mandates. The Conservation Element states that the City has primary responsibility to protect significant paleontological resources. The Conservation Element provides that if a project within a potentially significant paleontological area, a paleontologist must assess a project's potential impact to the site and should determine the appropriate mitigation of potential disruption of or damage to the site. If significant paleontologic resources are uncovered during a project's execution, a designated paleontologist must be allowed to order excavations stopped within reasonable time limits, to enable assessment, removal, or protection of the resource.

For the City and County, the Los Angeles County Museum of Natural History, in particular the George C. Page Museum, is the accepted authority concerning paleontological resources.

## **b) Existing Conditions**

The existing geologic conditions described below are summarized in the Geotechnical Feasibility Report. Subsurface data presented in the earlier fault investigation reports (listed above) performed by Group Delta Consultants and summarized in the Geotechnical Feasibility Report were used to evaluate the soil conditions beneath the Project Site. Accordingly, the description of the existing geologic conditions in this section is based on an analysis of and test results related to the Project Site, and adjacent and nearby properties. At the Kimpton Everly Argyle Hotel site to the north (1800 Argyle Avenue), and the Hollywood Millennium (1733-1741 Argyle Avenue) (not the Hollywood Center) and Argyle House mixed use (6236 and 6334 W. Yucca Street) sites to the west/southwest of the Project Site, subsurface explorations were conducted and trenches exposed that also provided geologic data (i.e., fault trace data) directly applicable to the Project Site. See Figure IV.E-4 below for the locations and description of the off-site explorations which provided data and projections that have been utilized to analyze Project Site conditions.

Explorations on the Project Site included 8 continuous core borings, 3 bucket auger borings, and 13 cone penetration tests (CPTs) to a maximum of 60 feet below the existing grade.<sup>13</sup> The CPT data provide a means to evaluate in-situ soil properties such as density, shear strength and compressibility. Limited laboratory testing was also performed on

<sup>12</sup> City of Los Angeles General Plan, Conservation Element, Chapter II, Section 3, adopted September 2001, pages II-5 and II-6. Available at: [https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation\\_Element.pdf](https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf). Accessed August 27, 2019.

<sup>13</sup> See Figure IV.E-4, Local Fault Investigation Map, of this EIR section for an illustration of the Project Site explorations.

representative samples of the cores obtained during the fault investigation, to further evaluate and correlate the physical properties and engineering characteristics of the soils encountered. Tests were performed on the corrosivity (pH, sulfate, chloride, electrical resistivity) and expansion index. Additionally, a 120-foot long, 10-foot deep trench was excavated along the west side of the Project Site adjacent to Argyle Avenue and a 30-foot long, 10-foot deep trench was excavated in the eastern area of the Project Site. The location and logs of the previous explorations, CPTs results, and geologic subsurface cross-sections are presented in the Geotechnical Feasibility Report within Appendix F-1 of this Draft EIR.

## (1) Regional and Local Geologic Setting

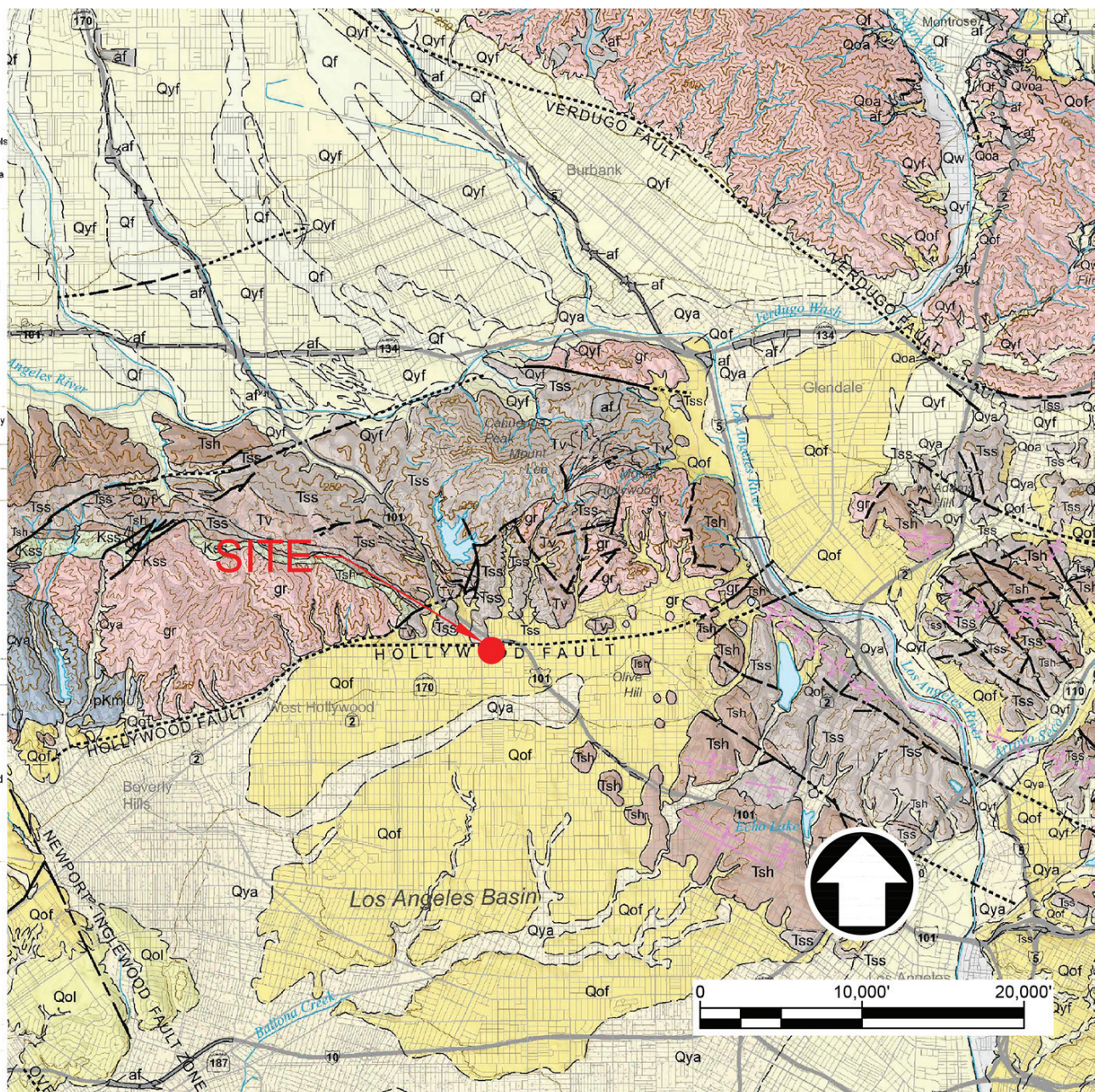
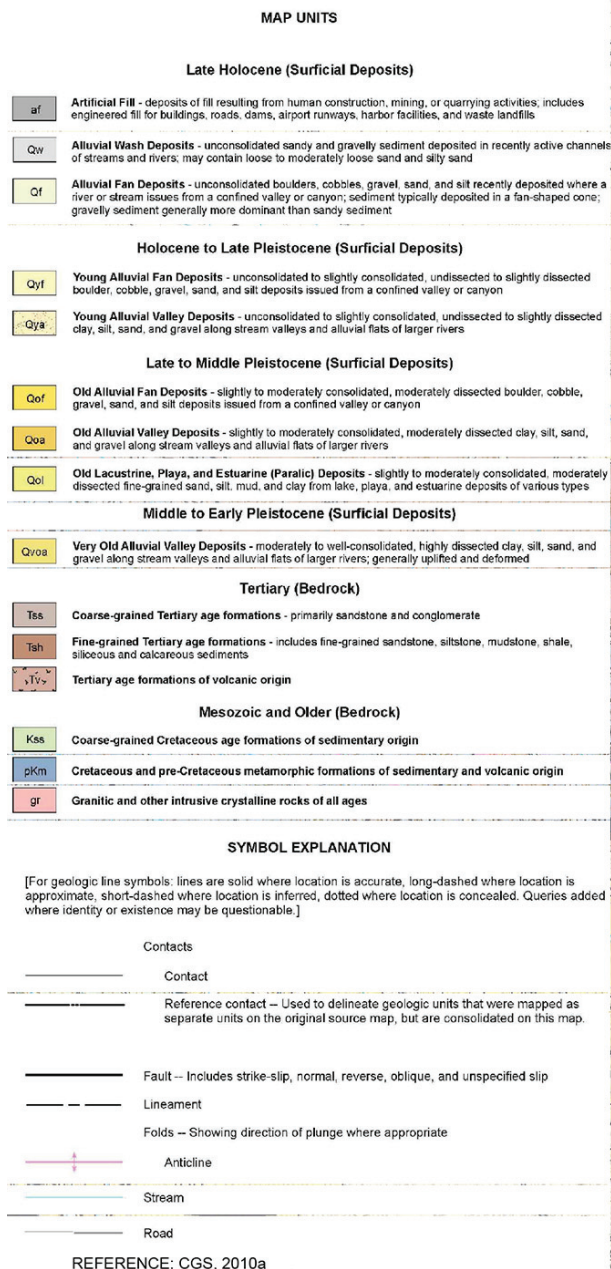
Regionally, the Project Site is located at the boundary of the Transverse and Peninsular Ranges Geomorphic Provinces within the Los Angeles Basin area of southern California. This boundary is defined by uplifting thrust blocks including the Santa Monica-Hollywood-Raymond Fault System. The Santa Monica east west-trending mountain range is located to the north of the Project Site and sedimentation thousands of feet thick blanketed by alluvial fan deposits are located to the south. Locally, the Project Site is located on an alluvial fan at the base of the southern limb of the Santa Monica Mountains, within the Hollywood Fault Zone. The alluvial fan slopes gently southward across the Project Site. Several south-draining canyons in the Santa Monica Mountains, including Cahuenga, Beachwood, and Brush canyons, created the alluvial fan debris deposits. The location of the Project Site with respect to the regional geologic setting is presented in **Figure IV.E-1, Regional Geology Map**.

### (a) Site Geology and Generalized Subsurface Conditions

The Project Site is a graded level pad positioned in the middle of a slope that descends approximately ten degrees to the south. Locally, the slope descends from an elevation of 430 feet at the northeast corner of the Project Site down to an elevation of 408 feet at the southwest portion of the Site. As noted above, on-site subsurface conditions were evaluated through field exploration data obtained from eight continuous core borings, three bucket auger borings, 13 cone penetration tests (CPTs), and two fault trenches. The subsurface conditions are described in descending order, below.

Fill materials underlie the ground surface and existing pavements on-site to depths of approximately two-to-six feet. However, Boring B-4 encountered fill materials to a depth of approximately nine feet, likely a portion of a localized deep fill associated with an underground sewer pipe and anomalous to predominant existing conditions. The fill materials consist of reddish brown, dry to moist, medium dense to stiff, fine to medium grained, silty sand, clayey sand, and lean clay. Variable amounts of fine to coarse gravel and cobbles were also encountered in the fill materials.





SOURCE: Group Delta Consultants, 2015

6220 West Yucca Project  
**Figure IV.E-1**  
 Regional Geology Map



(b) *Site Geology and Generalized Subsurface Conditions*

The Project Site is a graded level pad positioned in the middle of a slope that descends approximately ten degrees to the south. Locally, the slope descends from an elevation of 430 feet at the northeast corner of the Project Site down to an elevation of 408 feet at the southwest portion of the Site. As noted above, on-site subsurface conditions were evaluated through field exploration data obtained from eight continuous core borings, three bucket auger borings, 13 cone penetration tests (CPTs), and two fault trenches. The subsurface conditions are described in descending order, below.

Fill materials underlie the ground surface and existing pavements on-site to depths of approximately two-to-six feet. Boring B-4 encountered fill materials to a depth of approximately nine feet, likely a portion of a localized deep fill associated with an underground sewer pipe. The fill materials consist of reddish brown, dry to moist, medium dense to stiff, fine to medium grained, silty sand, clayey sand, and lean clay. Variable amounts of fine to coarse gravel and cobbles were also encountered in the fill materials.

A native sand unit underlies the fill in the eastern portion of the Project Site, encountered in borings B-2, B-7, and B-8 to at least 20 feet in depth. The sand deposit is a Holocene alluvial fan infill of a paleo-channel<sup>14</sup> trending south. The eastern portion of the Project Site overlies the west wall/slope of the paleo-channel. The buried slope is estimated to descend approximately 20 to 30 degrees to the east. Therefore, the sand deposit thickens to the east, to at least a depth of 20 feet under the Project Site. The deposit consists of a layered gradational soil profile of strong brown, moist, loose, fine to coarse grained silty sand, clayey sand, and poorly graded sand massive with local gravel and cobble channels. The unit unconformably<sup>15</sup> overlies alluvial sediments.

Older alluvial sediments underlie the fill materials across a majority of the Project Site and the sand unit in the east. The older alluvium is considered to be approximately 300,000 years old and consists of dense, very stiff to hard, strong brown with yellow, gray, and red mottling, clayey sand, silty sand, and sandy clay. Some gravel and cobbles were encountered in localized paleo-channels and a few gravel and cobbles were matrix supported<sup>16</sup> within massive layers. The thickness of the alluvium varies from north to south across the Project Site, at approximately seven feet depth in the north and over 60

<sup>14</sup> A paleo-channel is an old or ancient channel. Old or ancient river channels often infilled with coarse fluvial deposits which can store and transmit appreciable quantities of water. Where below the water table, these geomorphological features are often targeted for water supply. Source: The Groundwater Dictionary, Second Edition, prepared by Department Water Affairs, [http://www.dwa.gov.za/Groundwater/Groundwater\\_Dictionary/index.html?introduction\\_paleo\\_channel.htm](http://www.dwa.gov.za/Groundwater/Groundwater_Dictionary/index.html?introduction_paleo_channel.htm), accessed August 2017.

<sup>15</sup> If there is an interruption in sedimentation, such that there is a measureable gap in time between the base of the sedimentary unit and what lies beneath it, then the contact is unconformable, per Geology In website, <http://www.geologyin.com/2015/10/types-of-unconformities.html>, accessed October 20, 2018., per dictionary.com, accessed November 2017.

<sup>16</sup> "Matrix supported" means that the sedimentary formation contains a majority of fine silts and sand that hold the structure together, as opposed to containing a majority of larger materials that would indicate less stability.



feet depth in the south. The alluvium unconformably lies on top of a south sloping bedrock of the Modelo Formation.

The Modelo Formation, a Miocene age sedimentary rock, was also encountered at the Project Site. The encountered Modelo Formation consists of strong brown, reddish brown, and light gray, thinly interbedded, claystone, siltstone and sandstone. Thin conglomerate beds were encountered at a depth of 51 feet in boring B-2 and 57 feet in boring B-3. At 41 feet, boring B-3 encountered a well-cemented zone, and boring B-4 encountered refusal at 36 feet on possible hard bedrock. The contact between the old alluvium and bedrock occurs at a depth of approximately seven feet (elevation 410 feet) near the northwest corner of the Project Site and slopes down to a depth at least 60 feet (elevation 360 feet) at the south end of the Project Site. The buried bedrock surface descends to the south at about 30 degrees from horizontal.

### (c) *Expansive and Corrosive 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. A laboratory test on a representative sample of the clayier portion of the older alluvium at the Project Site indicated an expansive index (EI) of over 100, which corresponds to a highly expansive characteristic.

Corrosive soils, which can cause extensive damage to buried utility infrastructure and other support structures, are measured based on soil resistivity, which measures how much the soil resists the flow of electricity, and by evaluating the presence of corrosion characteristics. Based on the Geotechnical Feasibility Report, the tested soil at the Project Site has a “severe” (or very high) corrosion potential for buried metal.<sup>17</sup>

## (2) Groundwater

The Seismic Hazard Zone Report for the Hollywood Quadrangle reports the historically highest groundwater level in the Project Site area is deeper than 80 feet.<sup>18</sup> During Group Delta Consultants’ fault investigation for the Project Site in 2014, perched groundwater<sup>19</sup> was encountered at depths of 27 to 36 feet below existing grade, corresponding to an elevation of 376 to 394 feet. The bedrock appears to be a barrier for the groundwater on-site. Water was encountered within sandstone layers and pooled on top of the alluvial

<sup>17</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 5.8, page 17, prepared by Group Delta, dated March 2019.

<sup>18</sup> California Department of Conservation, Division of Mines and Geology, 1998, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California, Seismic Hazard Zone Report 026, Plate 1.2. Available at: <https://planning.lacity.org/eir/ConventionCntr/DEIR/files/references/California%20Division%20of%20Mines%20and%20Geology,%20%20Hollywood%20Quadrangle,%201998.pdf>.

<sup>19</sup> Perched groundwater is any independent and unconfined volume of groundwater separated from an underlying main body of groundwater by an unsaturated zone; typically occurs above discontinuous impermeable layers. Source: The Groundwater Dictionary, Second Edition, prepared by Department Water Affairs, [http://www.dwa.gov.za/Groundwater/Groundwater\\_Dictionary/index.html?introduction\\_perched\\_groundwater.htm](http://www.dwa.gov.za/Groundwater/Groundwater_Dictionary/index.html?introduction_perched_groundwater.htm), accessed August 2017.

bedrock contact. Seasonal perched groundwater may be present on shallower less-permeable layers within the alluvium.

### (3) Geologic Hazards

#### (a) *Faulting and Seismicity*

A fault is a fracture in the crust of the earth along which rocks on one side have moved relative to those on the other side. Most faults are the result of repeated displacements over a long period of time. A fault trace is the line on the earth's surface defining the fault. Surface rupture occurs when movement on a fault deep within the earth breaks through to the surface. Fault rupture almost always follows preexisting faults, which are zones of weakness. Rupture may occur suddenly during an earthquake or slowly in the form of fault creep. Sudden displacements are more damaging to structures because they are accompanied by shaking. Fault creep is the slow rupture of the earth's crust.<sup>20</sup>

Buried, or blind, thrust faults are faults that do not rupture all the way up to the surface, leaving no evidence on the ground.<sup>21</sup> Precisely because they are buried, their existence is usually not known until they produce an earthquake. In the southern California area, buried thrust faults are typically defined broadly based on an analysis of the seismic wave recordings of hundreds of small and large earthquakes.

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 Act, and may have other non-regulatory meanings in the scientific literature or in other regulatory environments. In order to avoid confusion, the terms listed below will be used to provide added precision in classifying faults regulated by the Alquist-Priolo Act. Faults are classified into three categories on the basis of the absolute age of their most recent movement:<sup>22</sup>

- a) 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) and is not a radiocarbon (14C) age determination, which requires calibration in order to derive an absolute age.
- b) Pre-Holocene faults: Faults that have not moved in the past 11,700 years, thus do not meet the criteria of “Holocene-active fault” as defined in the Alquist-Priolo Act and SMGB regulations. This class of fault may be still capable of surface rupture, but is

<sup>20</sup> California Department of Conservation Website, Alquist-Priolo Earthquake Fault Zones, Surface Fault Rupture Explained. Available at: <https://www.conservation.ca.gov/cgs/alquist-priolo>, accessed August 2017.

<sup>21</sup> USGS Website, Earthquake Hazards Program, Earthquake Glossary, <https://earthquake.usgs.gov/learn/glossary/?term=blind%20thrust%20fault>, accessed August 2017.

<sup>22</sup> Earthquake Fault Zones, Special Publication 42, Interim Revised 2018, prepared by Department of Conservation, California Geological Survey, <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>, accessed October 2018.

not regulated under the Alquist-Priolo Act. Depending on available site-specific and regional data such as proximity to other active faults, average recurrence, variability in recurrence, the timing of the most recent surface rupturing earthquake, and case studies from other surface rupturing earthquakes, a development project geologist may, but is not required to, recommend setbacks. Engineered solutions can also be considered by a licensed engineer operating within his or her field of practice.

- c) 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 Act, age-undetermined faults within regulatory Earthquake Fault Zones are considered Holocene-active until proved otherwise.

Earthquake Fault Zones are regulatory zones (also known as Alquist-Priolo Zones) that encompass traces of Holocene-active faults, and are used 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. (California Public Resources Code Division 2, Chapter 7.5, Section 2621.)

A project site located outside of an Earthquake Fault Zone is also regulated by the Alquist-Priolo Act if a Holocene-active fault is found at that site. This can happen if a lead agency has established its own regulatory zone requiring an assessment of surface fault rupture hazard or in a situation where a Holocene-active fault is discovered during a geologic investigation for that project. If located outside of an Earthquake Fault Zone, age-undetermined faults are not regulated by the Alquist-Priolo Act. However, a development project geologist may want to consider all available data and provide recommendations regarding whether setbacks or other engineered solutions should be considered in the placement or design of a structure crossing these faults.

CGS policy requires delineation of a boundary zone on both sides of a known fault trace, called the Earthquake Fault Zone. The delineated width of an Earthquake Fault Zone<sup>23</sup> is based on the location precision, complexity, or regional significance of the fault, but is ordinarily one-quarter mile or less in width. As stated above, on November 6, 2014, the CGS released the official map of the Earthquake Zones of Required Investigation, Hollywood Quadrangle. If a project site lies within a designated Alquist-Priolo Earthquake Fault Zone, issuance of a development permit requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface

<sup>23</sup> California Department of Conservation, Special Publication 42, Op. Cit. Available at: <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>. Accessed October 2018.

displacement from the fault.<sup>24</sup> Based on the official map released by the CGS on November 6, 2014, the Project Site is located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault as shown on **Figure IV.E-2, Earthquake Zones Map**.

The location of the Project Site with respect to regional faults with the potential for future seismic activity is provided in **Figure IV.E-3, Regional Fault Map**. The nearest significant 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 an estimated reverse strike-slip fault<sup>25</sup> capable of producing a potential maximum moment magnitude (Mw) 6.7 earthquake. The current published CGS map shows two traces of the Hollywood Fault near the Project Site, as shown in Figure IV.E-2. One trace is mapped across Yucca Street approximately 50 feet north of the Project Site boundary, trending east-west. The second trace is mapped across Carlos Avenue approximately 220 feet south of the Project Site boundary, also trending east-west. As discussed in more detail in Ground Surface Rupture below, geotechnical faulting investigations have indicated that no active faulting occurs beneath or projects toward the Project Site, including the Hollywood Fault.

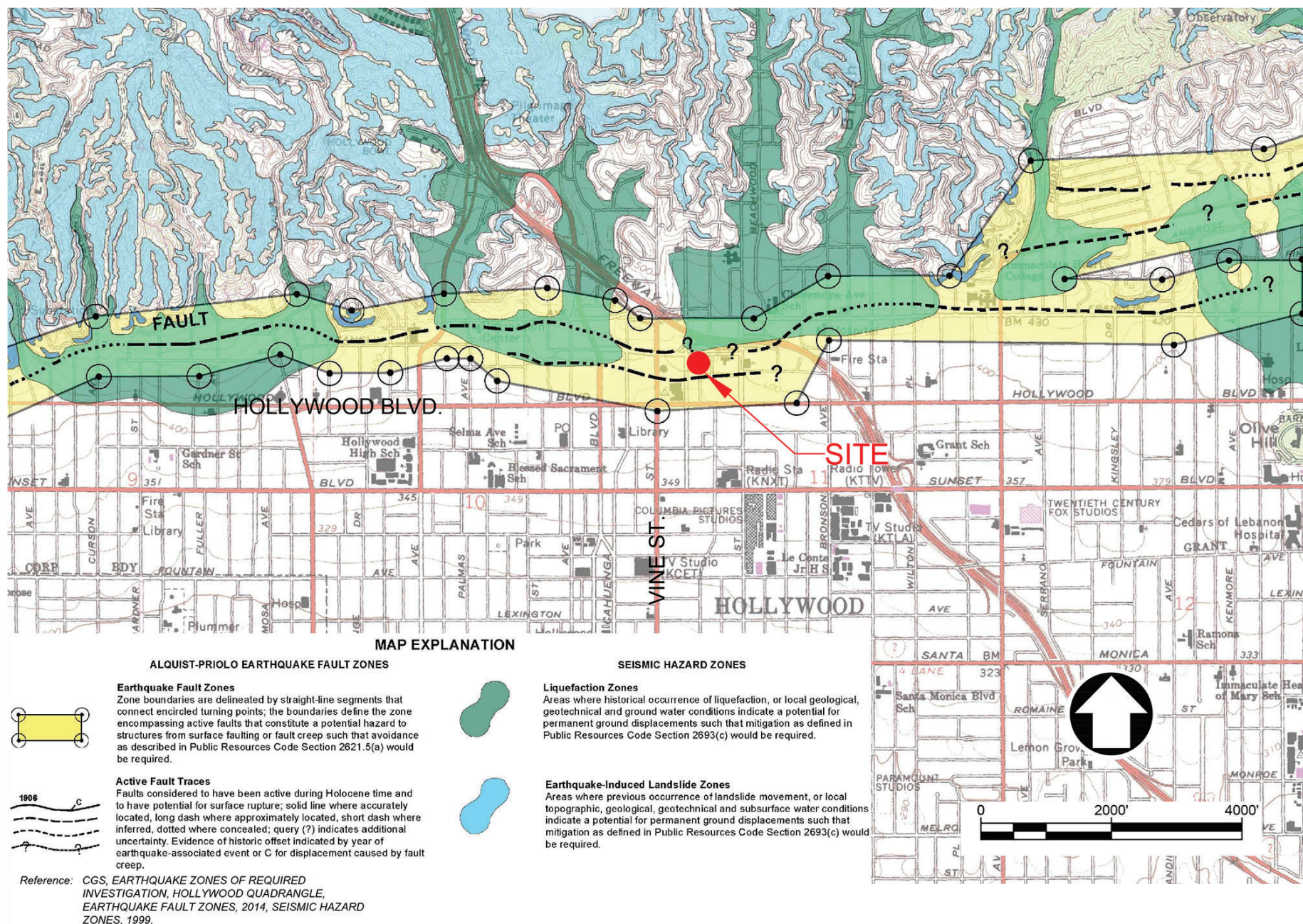
As Figure IV.E-3 also shows, other significant seismically active faults near the Project Site include the Upper Elysian Park, Puente Hills, Newport-Inglewood, Verdugo, and Sierra Madre Faults. The Upper Elysian Park Fault and the Puente Hills Fault are estimated to be within two and three miles east and south of the Project Site, respectively, trending northwest and dipping northeast. Both faults are considered to be blind thrust faults.

As discussed above, blind thrust faults have the potential for surface deflection or folding during earthquakes. While they do produce earthquakes, they are not considered for active Alquist-Priolo Zoning. A potential maximum Mw 6.7 is estimated for these blind thrust faults. The Newport-Inglewood Fault Zone is located approximately 5.7 miles east of the Project Site, trending northwest over 40 miles in length. It is estimated to be a right lateral strike slip fault capable of producing a potential maximum Mw 7.5. The Verdugo Fault is located approximately six miles east of the Project Site, trending northwest over 13 miles in length.

<sup>24</sup> Ibid.

<sup>25</sup> 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>.

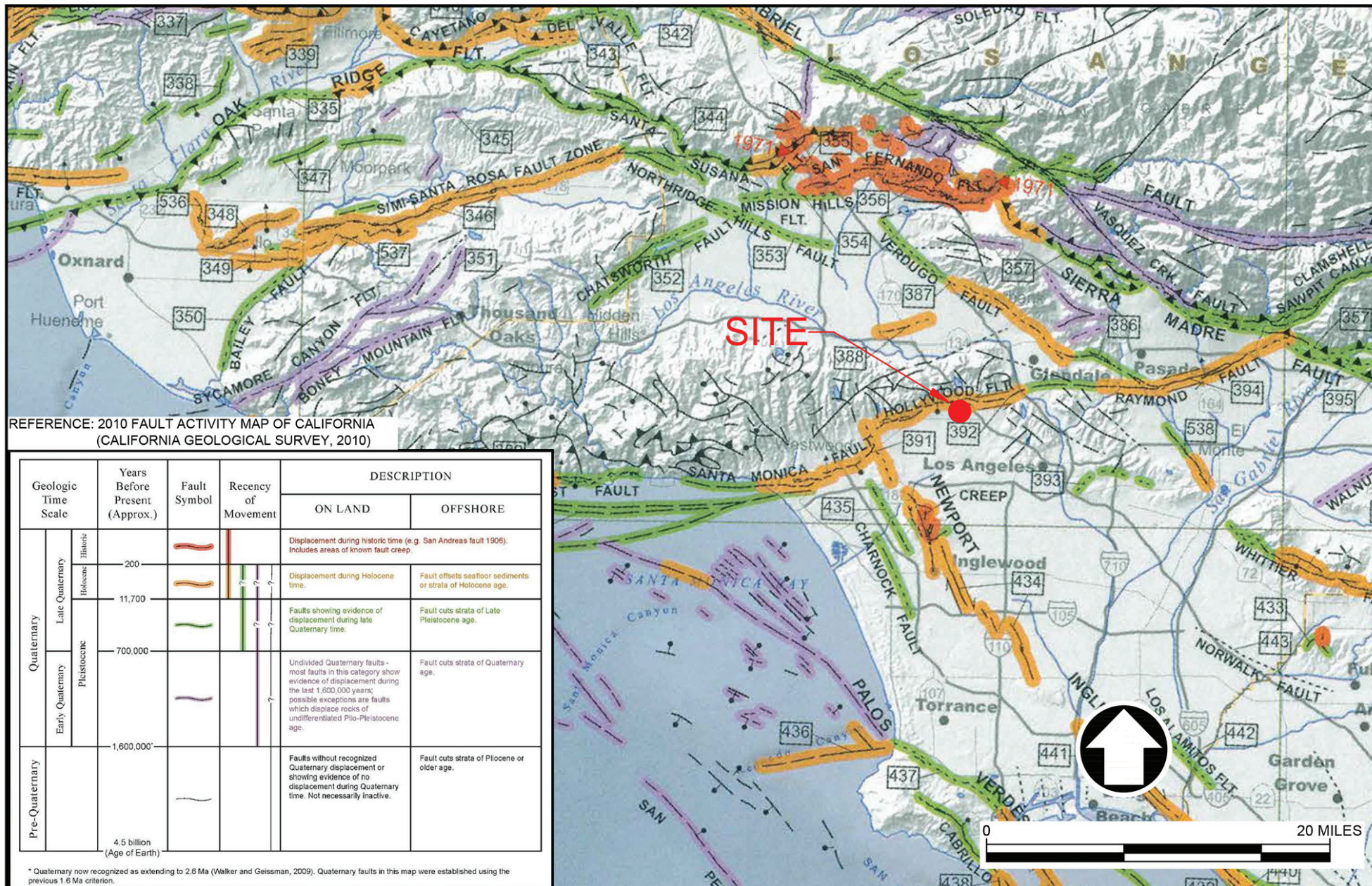




SOURCE: Group Delta Consultants, 2015

6220 West Yucca Project  
**Figure IV.E-2**  
Earthquake Zones Map





SOURCE: Group Delta Consultants, 2015

6220 West Yucca Project

**Figure IV.E-3**  
Regional Fault Map



The Verdugo Fault is estimated to be a reverse fault<sup>26</sup> 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 site, trending northwest over 47 miles in length. It is estimated to be a reverse fault and is considered capable of producing earthquakes with a potential maximum Mw 7.3.

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<sup>27</sup> plate boundary that traverses northwest over 800 miles across the length of California's coastline. 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 the 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.

Local historical earthquakes recorded from 1933 to present within a 100 kilometer radius of the Project Site include 41 recorded events with magnitudes greater than Mw 5.0.<sup>28</sup> 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 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.<sup>29</sup>

<sup>26</sup> 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>.

<sup>27</sup> 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>.

<sup>28</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.2, pages 7-8, prepared by Group Delta, dated March 2019.

<sup>29</sup> Ibid.

(b) *Ground Surface Rupture*

As noted above, the Project Site is located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault. The Hollywood Fault has been classified by the CGS as a Holocene-active fault. As such, this fault has a high potential for future earthquakes capable of producing future ground surface ruptures.<sup>30</sup>

The current mapped location of the Hollywood Fault within the vicinity of the Project Site is largely based on historical geomorphic evidence of south facing tectonic fault scarps<sup>31</sup> along the southern foothills of the Santa Monica Mountains. The Project Site is located on an anomalous steepened alluvial fan surface, interpreted by the CGS as a possible tectonic fault scarp. The most recent seismic event evidence on the Hollywood Fault indicates that the last earthquake event on the fault occurred between 6,000 to 9,000 years ago. Calculated slip rates<sup>32</sup> for the Hollywood Fault estimate at least a 0.075 millimeters per year (mm/yr) down dip slip rate and at least a 0.25 mm/yr strike separation rate. In addition, a significant groundwater level variance in the area was interpreted as evidence of the presence of faulting within the Project Site area.

As summarized in the Geotechnical Feasibility Report, the fault activity investigations performed by Group Delta Consultants in 2014 for the Project Site and fault investigations performed by Group Delta Consultants in 2015 for the surrounding areas, including the sites north and west of the Project Site, indicate there is no faulting beneath or projecting toward the Project Site, as shown in **Figure IV.E-4, Local Fault Investigation Map**. The interpreted tectonic fault scarp, on which the Project Site was thought to be located was determined to be a buried nose of a ridgeline extending south from the Santa Monica Mountains.<sup>33</sup> As shown on Figure IV.E-4, fault trenches at the Yucca and Millennium East sites exposed the erosional nature of the bedrock contact with upper alluvial units. The hypothesized scarp was determined to be an erosional south-facing slope and not fault related.<sup>34</sup> Groundwater level variance in the area was determined to be depositionally controlled<sup>35</sup> due to the impermeable underlying sloped bedrock, and not due to faulting.

<sup>30</sup> Ibid.

<sup>31</sup> The fault scarp is the 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>.

<sup>32</sup> The slip rate is how fast the two sides of a fault are slipping relative to one another, as determined from geodetic measurements, from offset man-made structures, or from offset geologic features whose age can be estimated. It is measures parallel to the predominant slip direction or estimated from the vertical or horizontal offset of geologic markers. Source: USGS Website, Earthquake Hazards Program, Earthquake Glossary, <https://earthquake.usgs.gov/learn/glossary/?term=slip%20rate>.

<sup>33</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.3, page 8, prepared by Group Delta, dated March 2019.

<sup>34</sup> Ibid.

<sup>35</sup> In this reference, "depositional control" means that the depth and extent of the buildup of groundwater is controlled by layers of sedimentary materials or limited by the shallow depth of underlying bedrock.



# LEGEND

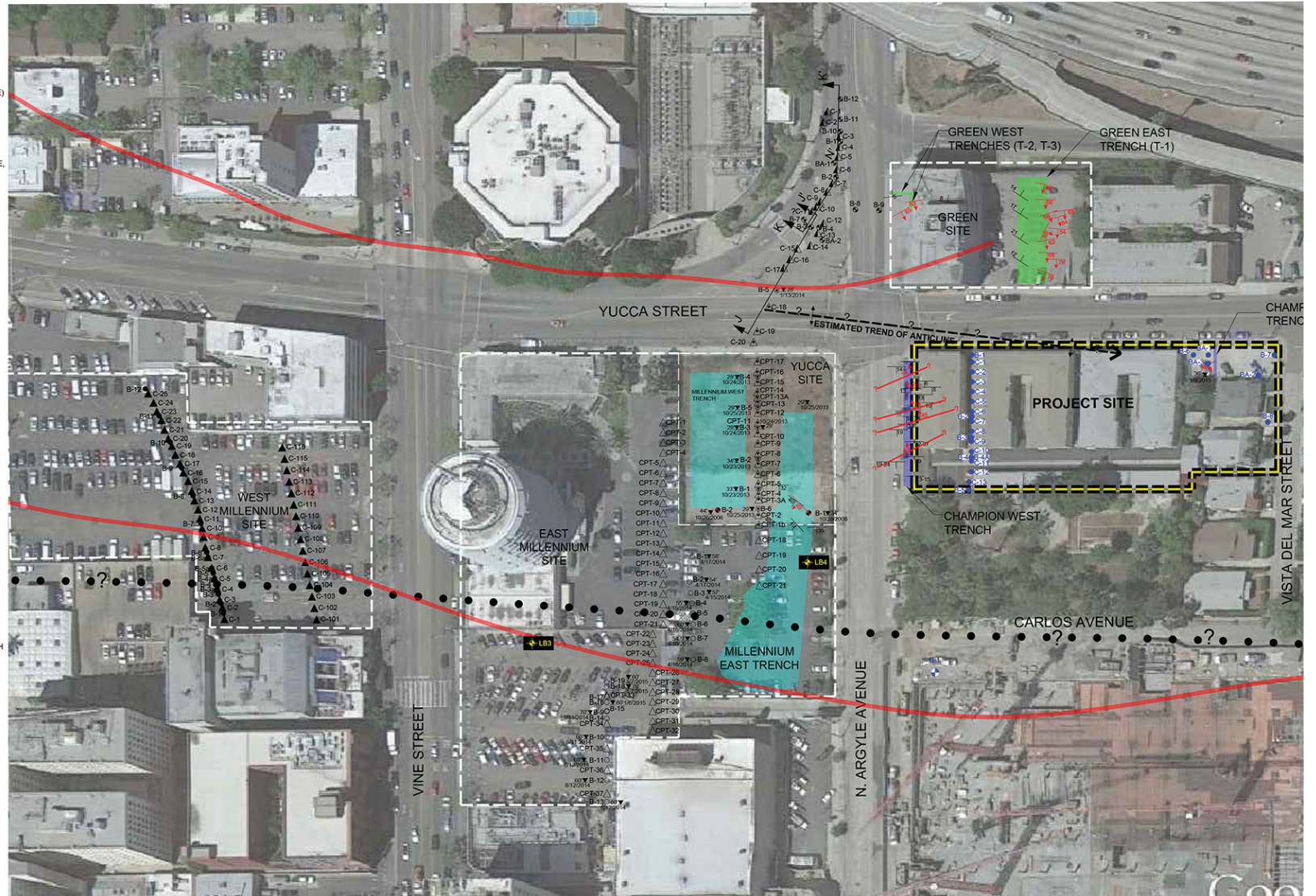
- ● ● ● ? APPROXIMATE BURIED INACTIVE FAULT LOCATION PROJECTED TO SURFACE, QUERIED WHERE POORLY CONFINED
- 32° STRIKE AND DIP OF BEDDING (BELOW SURFACE)
- 70° STRIKE AND DIP OF FAULT (BELOW SURFACE)
- 45' 1/29/2014 DEPTH OF WATER BELOW GROUND SURFACE ENCOUNTERED IN EXCAVATION, AND DATE
- 2 2 APPROXIMATE LOCATION OF BURIED ANTICLINE, BARB INDICATES DIRECTION OF PLUNGE
- APPROXIMATE PROPERTY LINE OF PROPERTY SITE
- CURRENT CGS ACTIVE HOLLYWOOD FAULT SURFACE TRACE

## PRIOR INVESTIGATIONS

- B-5 WEST MILLENNIUM SITE BORING LOCATION AND NUMBER (GDC, 2015a)
- ▲ CPT-16 CONE PENETRATION TEST LOCATION AND NUMBER (GDC, 2015a)
- B-13 EAST MILLENNIUM SITE BORING LOCATION AND NUMBER (GDC, 2015a)
- △ CPT-37 CONE PENETRATION TEST LOCATION AND NUMBER (GDC, 2015a)
- ⊙ B-6 YUCCA SITE BORING LOCATION AND NUMBER (GDC, 2014d)
- ▲ CPT-21 CONE PENETRATION TEST LOCATION AND NUMBER (GDC, 2014d)
- B-2 BORING LOCATION AND NUMBER (GDC, 2006)
- B-6 GREEN SITE BORING LOCATION AND NUMBER (GDC, 2014a)
- ▲ CPT-21 CONE PENETRATION TEST LOCATION AND NUMBER (GDC, 2014a)
- LB4 BORING LOCATION AND NUMBER (LOGAN 2011)
- B-1 GEOTECHNICAL BORING BY APPROXIMATE LOCATION OF GEOTECHNOLOGIES, 2006
- K K LOCATION OF CROSS SECTION PUBLISHED IN PRIOR STUDY (GDC, 2014a)
- TRENCH LOCATION FOOTPRINT
- CHAMPION WEST AND CHAMPION EAST TRENCH LOCATION FOOTPRINT (GDC, 2014a)
- GREEN WEST AND GREEN EAST TRENCH LOCATION FOOTPRINT (GDC, 2014c)
- B-6 BORING LOCATION AND NUMBER
- C-20 CPT (CONE PENETRATION TEST) LOCATION AND NUMBER
- BA-1 BUCKET AUGER BORING LOCATION AND NUMBER



0 200  
Feet



6220 West Yucca Project

SOURCE: Group Delta Consultants, 2015

**Figure IV.E-4**  
Local Fault Investigation Map

Stratigraphic and structural data correlated from adjacent sites indicate the faulting encountered within the subsurface older alluvial soils onsite is related to pre-Holocene folding and was concluded to be inactive. A Holocene age alluvial sand deposit and underlying pre-Holocene “mud flow” deposits were encountered continuously from Argyle Avenue north of Yucca Street, west of Argyle Avenue south of Yucca Street to at least the southern extent of the Millennium East site. This continuous stratigraphy precludes the possibility of active east-west trending faulting underlying these sites and projecting east toward the Project Site.<sup>36</sup>

*(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.<sup>37</sup>

While the 1996 City of Los Angeles General Plan Safety Element classifies the Project Site as an part of an area that could be susceptible to liquefaction,<sup>38</sup> the City’s Zoning Information and Map Access System (Zimas) indicates that the Project Site is not located in an area that has been identified by the State of California as being potentially susceptible to liquefaction.<sup>39</sup> In addition, the Seismic Hazards Map for the Hollywood Quadrangle, which was released by the State Division of Mines and Geology (now the CGS) in March 1999, does not classify the Project Site as part of a liquefiable area.<sup>40</sup> This determination was based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The 1999 Seismic Hazards Zone Map was re-released by CGS in November 2014 as part of the current Earthquake Zones of Required Investigation Map for the Hollywood Quadrangle.<sup>41</sup> This more recent and authoritative Seismic Hazard Zones Map, which is determinative as to whether a site in

<sup>36</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.3, page 8-9, prepared by Group Delta, dated March 2019.

<sup>37</sup> Ibid. <https://planning.lacity.org/cwd/gnlpn/safteyelt.pdf>. Accessed June 2019.

<sup>38</sup> City of Los Angeles General Plan Safety Element, November 26, 1996, Exhibit B, Areas Susceptible to Liquefaction, available at: <https://planning.lacity.org/cwd/gnlpn/safteyelt.pdf>. Accessed June 2019.

<sup>39</sup> City of Los Angeles, ZIMAS website, <http://zimas.lacity.org/>. Accessed June 2019.

<sup>40</sup> California Division of Mines and Geology. 1998. Seismic Hazard Zone Hollywood 7.5 Quadrangle, Los Angeles County, California, available at: <https://planning.lacity.org/eir/ConventionCntr/DEIR/files/references/California%20Division%20of%20Mines%20and%20Geology,%20%20Hollywood%20Quadrangle,%201998.pdf>. Accessed June 2019.

<sup>41</sup> California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Los Angeles, California, 1999.

the Hollywood area is susceptible to liquefaction, reconfirms that the Project Site is not located in an area classified as a liquefiable area. Furthermore, also indicates that the Project Site is not located within a liquefaction area.<sup>42</sup>

Moreover, as discussed in Special Publication (SP) 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California,<sup>43</sup> the vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity. Cohesive soils are generally not considered susceptible to soil liquefaction. Based on site-specific soil investigations, as discussed above, the Project Site is mostly underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral spreading. A wedge of loose sand deposits was encountered in the east portion of the Project Site, at boring B2 and B7 locations to depth of 20 feet below ground surface and is preliminarily subject to dynamic, or physical, settlement, in which the ground would compress under weight and, if uncorrected, building foundations would have the potential to sink or fail.

Beside the areas at the boring B2 and B7 locations, preliminary evaluation of the older alluvial soils underlying the Project Site indicates a low potential for soil collapse and settlement. Further, no history of subsidence is known to impact the Project Site and this hazard is considered low.<sup>44</sup>

#### (d) *Landslide and Seismically Induced Slope Instability*

Landslides are movements of surface material down a slope<sup>45</sup>. The Project Site is a relatively flat site located within a slope descending approximately 6:1 (Horizontal: Vertical) to the south.<sup>46</sup> The surrounding slope is landscaped with garden walls, trees, grass, and sidewalks. Bedrock does not appear at the surface. As described above, dense to stiff, older alluvium is anticipated to be blanketing the bedrock to depths of at least 25 feet. According to the Geotechnical Feasibility Report, the potential for landsliding and seismically induced slope instability at the Project Site is considered low.<sup>47</sup> In addition, 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

<sup>42</sup> City of Los Angeles General Plan Safety Element, November 1996, Exhibit B, Areas Susceptible to Liquefaction, available at: [https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\\_Element.pdf](https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf). Accessed September 2019.

s.lacity.org/" <http://zimas.lacity.org/>. Accessed June 2019.

<sup>43</sup> Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, prepared by California Geologic Survey, 2008, <http://www.conservation.ca.gov/cgs/shzp/webdocs/Documents/sp117.pdf>.

<sup>44</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.4, page 9, prepared by Group Delta, dated March 2019.

<sup>45</sup> Source: USGS Website, Earthquake Hazards Program, Earthquake Glossary, <https://earthquake.usgs.gov/learn/glossary/?term=landslide>.

<sup>46</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.5, page 9, prepared by Group Delta, dated March 2019.

<sup>47</sup> Ibid.



Areas in the City of Los Angeles.<sup>48</sup> The City's ZIMAS data base also indicates that the Project Site is not located within a hillside area that would be subject to hillside development constraints or within a landslide area.<sup>49</sup>

#### (e) *Other Geologic Hazards and Features*

The Project Site is not located within a City of Los Angeles Methane Zone or Methane Buffer Zone.<sup>50</sup> Additionally, according to the State of California Department of Oil, Gas, and Geothermal Resources Regional Wildcat Map, the Project Site is not located within the limits of an oil field, and no active oil wells have been drilled on the Project Site.<sup>51</sup>

Also, no unique, distinct or prominent geologic or topographic features, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands, are located on the Project Site.

### (4) Paleontological Resources

The results of a previously conducted paleontological resources records search for the Palladium Residences<sup>52</sup> Project (located one-quarter mile south of the Project Site) found that no vertebrate fossil localities from the Natural History Museum of Los Angeles County (NHMLAC) archives have been recorded within the Project Site and surrounding vicinity. Surface deposits found at the Project Site consist of soil on top of terrestrial older Quaternary Alluvium derived from the Hollywood Hills, and several fossil localities from these older Quaternary sediments have been documented in the general vicinity of the Project Site. The closest localities (LACM 6297-6300) from Late Pleistocene deposits are located approximately one-half mile east of the Project Site, along Hollywood Boulevard and between the Hollywood Freeway (US-101) and Western Avenue. LACM 6297-6300 yielded fossil specimens of a horse, bison, camel, and mastodon at depths of 47 and 80 feet below the surface during work for the Metro Red Line tunnels and stations. Other fossil localities (LACM 5845, LACM 3250 and LACM 3371) have also been recorded approximately two to three miles south of the Project Site. LACM 5845, located near the intersection of Western Avenue and Council Street, produced a fossil specimen of a mastodon at depths of five to six feet below the surface. LACM 3250, located at the intersection of Madison Avenue and Middlebury Street, yielded a fossil specimen of a mammoth at a depth of eight feet below street level. LACM 3371, situated near the

<sup>48</sup> City of Los Angeles General Plan Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles, [https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\\_Element.pdf](https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf). Accessed September 2019.

<sup>49</sup> City of Los Angeles, ZIMAS website, <http://zimas.lacity.org/>. Accessed June 2019.

<sup>50</sup> City of Los Angeles Zimas website, parcel information for 6220 Yucca Street, available at: <http://zimas.lacity.org/>, parcel information for 6220 Yucca Street. Accessed October 20, 2018

<sup>51</sup> California Department of Oil, Gas, and Geothermal Resources, Regional Wildcat Map W1-5, May 26, 2010.

<sup>52</sup> Results of the paleontological records search for the Palladium Residences Project can be found in Appendix C of the Draft Environmental Impact Report, [http://planning.lacity.org/eir/PalladiumResidences/DEIR/DEIR/\\_Start\\_Menu-Palladium\\_Residences-DEIR.html](http://planning.lacity.org/eir/PalladiumResidences/DEIR/DEIR/_Start_Menu-Palladium_Residences-DEIR.html).

intersection of Sierra Bonita Avenue and Oakwood Avenue, yielded a fossil specimen of a bison at a depth of 12 feet below the surface.

### 3. Project Impacts

#### a) Thresholds of Significance

In 2015, the California Supreme Court, in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project.<sup>53</sup> Specifically, the *CBIA v. BAAQMD* decision held that an impact from the existing environment on a project, including the project's future users and/or residents, is not an impact for the purposes of CEQA. However, if a project, including its future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project.

In accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, a project would have a potentially significant impact related to geology and soils if it would result in any of the following:

***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<sup>54</sup> Special Publication 42);***
- ii. Strong seismic ground shaking;***
- iii. Seismic-related ground failure, including liquefaction; or***
- 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.***

<sup>53</sup> *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4<sup>th</sup> 369, Case No. S213478.

<sup>54</sup> Now the California Geological Survey

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

**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.*

**Threshold (f):** *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

In assessing the Project's potential impacts related to geology and soils in this section, the City has determined to use Appendix G of the State CEQA Guidelines, as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Projects potential impacts under these thresholds:

### (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.

### (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) Paleontological and Geological Resources

- Whether, or the degree to which, the project may result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or Statewide significance.
- One or more distinct and prominent geologic or topographic features would be destroyed, permanently covered, or materially and adversely modified. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands.

## b) Methodology

### (1) Geologic Hazards

The analysis of potential Project impacts associated with existing geology and soils conditions is based on the information provided by the Geotechnical Feasibility Report prepared for the Project by Group Delta Consultants included as Appendix F-1 to the Draft

EIR. As discussed above and in the Geotechnical Feasibility Report, information, conclusions, and recommendations in the Geotechnical Feasibility Report are based on site testing and reconnaissance, records review, and a summary of the findings of prior 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) and certain sites near the Project Site. The Geotechnical Feasibility Report was prepared according to requirements established by LADBS. These requirements are based on guidelines and specifications established in such sources as the City of Los Angeles Building Code, CGS Publications, American Society for Testing and Materials (ASTM) Publications, and Department of Building and Safety Information Bulletins (IB), which document LADBS requirements and guidelines for specific topics in greater detail than the Building Code.

Per the established procedures, the Geotechnical Feasibility Report evaluates the underlying geologic and soil conditions to determine their potential for causing and the Project's potential, if any, for exacerbating hazardous conditions, and identifies foundation requirements needed to ensure that new building construction is safe. Site borings were conducted at various locations across the Project Site to ensure coverage across the entire building(s) site, and capture conditions at all locations. As the City's approval letter confirms, the report provides 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 report also identifies considerations to be taken into account in the design of building foundations.

According to Chapter IX LAMC Div. 18, Sec. 91.1803, a final geotechnical report must also be prepared based on the final construction and building plans prepared by the Applicant and must be 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.

## (2) Paleontological Resources

. Because the Project Site is entirely developed or paved and lacks any visible native ground surface or potential for surface exposure of resources, no paleontological pedestrian survey was undertaken. The objective of the record search for the Project Site 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 construction excavations associated with the Project Site 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.

The potential for the Project Site to contain buried paleontological resources was assessed based on the findings of the paleontological resources records search, subsurface geological conditions, land use history, past disturbances, and the proposed excavation parameters for the Project. The evaluation of mitigation to address any

potential paleontological resources is based on SVP criteria for screening the paleontological potential of rock units (High, Undetermined, Low) and established assessment and mitigation procedures tailored to such potential.

As defined by the SVP significant nonrenewable paleontological resources are:

*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. Certain 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:

*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].*

All identifiable vertebrate fossils are considered to have significant scientific value because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution.

Fossils are contained within surficial sediments or bedrock, and are therefore not observable or detectable unless exposed by erosion or human activity. A geologic unit known to contain significant fossils is considered to be “sensitive” to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either directly or indirectly disturb or destroy fossil remains.

- In the absence of surface fossils, the assessment of rock unit sensitivity is based on the known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside of the study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if the fossils are significant, that successful mitigation and salvage efforts may be undertaken.



### c) Project Design Features

There are no Project Design Features applicable to geology and soils.

### d) Analysis of Project Impacts

The Project would include the construction of up to two and-a-half levels of subterranean parking which would involve excavation to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending down to approximately 40 feet below ground surface. Approximately 120,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase.

Project construction is typical of construction in urban environments and would not involve mining operations, blasting, deep excavation into the earth, or boring of large areas that would create unstable seismic conditions or stresses in Earth's crust. Furthermore, as discussed above, there are no active or potentially active faults that underlie the Project Site. Accordingly, as discussed in detail below, the Project would not exacerbate seismic conditions or other geologic conditions on the Project Site or in the vicinity, and, as such, impacts related to surface ground rupture, strong seismic ground shaking, liquefaction, and seismically induced settlement would be less than significant. In addition, the Project would not cause, accelerate, or exacerbate in whole or in part existing geologic hazards, including instability from erosion, that would result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk or injury.

***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.***
- ii. Strong seismic ground shaking?***
- iii. Seismic-related ground failure, including liquefaction?***
- iv. Landslides?***

#### (1) Fault Rupture

The Alquist-Priolo Earthquake Fault Zoning Act prohibits the construction of buildings for human occupancy across the trace of a known fault, and requires structures intended for human occupancy to be set back generally 50 feet from the fault trace. As discussed

above, the nearest significant fault to the Project Site is the Hollywood Fault and the Project Site is located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault. The current published CGS map shows two traces of the Hollywood Fault near the Project Site. One trace is mapped across Yucca Street over 50 feet north of the Project Site boundary trending east-west (see Figure IV.E-4). The second trace is mapped across Carlos Avenue approximately 220 feet south of the Project Site boundary also trending east-west. As referenced in the Geotechnical Feasibility Report, and provided in Appendix F, of this Draft EIR, fault activity investigations performed by Group Delta Consultants in 2014 and 2015 for the Project Site and for the surrounding areas, including the sites north and west of the Project Site, indicate there is no active faulting beneath the Project Site or projecting toward the Project Site.<sup>55</sup> Thus, the potential for ground surface rupture at the Project Site is considered to be low.<sup>56</sup> Based on the fault data collected and known for the Hollywood Fault near the Project Site, project structures would be located at a distance greater than 50 feet from the nearest Hollywood Fault trace, which distance would be consistent with the requirements of the Alquist-Priolo 50-foot setback requirement. Thus, development of the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, direct and indirect impacts regarding surface fault rupture would be less than significant, and no mitigation measures are required.

## (2) Strong Seismic Ground Shaking

As discussed above, the Geotechnical Feasibility Report, which references various fault investigation studies conducted near the Project Site (see subsection 1, Introduction, above), has concluded that there is no active faulting beneath the Project Site or projecting 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 faults locally and in the region, including, but not limited to, the adjacent Hollywood Fault, the Upper Elysian Park, Puente Hills, Newport-Inglewood, Verdugo, and Sierra Madre 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 exacerbate existing environmental conditions related to seismic ground shaking at the Project Site because Project construction would not involve mining operations, blasting, deep excavation into the earth, or boring of large areas that would create unstable seismic conditions and would exacerbate 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

<sup>55</sup> As states earlier, fault Investigation Reports are included in Appendices E-2 through E-4 of this Draft EIR.

<sup>56</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.3, page 8, prepared by Group Delta, dated March 2019.

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 Geotechnical Feasibility Report 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 Final Geotechnical Report will be prepared to develop geotechnical recommendations for final design, including drilling and sampling geotechnical borings, performing laboratory testing to confirm engineering parameters and detailed engineering analyses.

The Geotechnical Feasibility Report provides 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. Thus, compliance with applicable regulatory requirements (e.g. the City of Los Angeles Building Code) 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. 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 regulatory requirements. Therefore, based on the above, development of the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving strong seismic ground shaking hazards, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, direct and indirect impacts regarding ground shaking would be less than significant. No mitigation measures are required.

### (3) Seismic-Related Ground Failure, Including Liquefaction

As discussed above, according to the State of California Seismic Hazard Zones Map of the Hollywood Quadrangle (see Figure IV.E-2), the Project Site is not located within a State of California seismic hazard liquefaction zone. The City's Zimas website also reports that the Project Site is not subject to liquefaction hazards.<sup>57</sup> As explained above, although the City of Los Angeles General Plan Safety Element, Exhibit B (Figure IV.E-5), the Project Site is located within an area susceptible to liquefaction. However, as discussed below, the on-site geological investigation substantiates that the Project Site is not located within a site subject to liquefaction hazard.<sup>58</sup>

<sup>57</sup> City of Los Angeles Zimas website parcel information for 6220 Yucca Street, available at <http://zimas.lacity.org/>. Accessed June 2019.

<sup>58</sup> Group Delta, Updated Geotechnical Feasibility Report, March 29, 2019, page 9.

Moreover, as discussed in CGS SP 117A, the vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity. Cohesive soils are generally not considered susceptible to soil liquefaction. According to the Geotechnical Feasibility Report, 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.

A wedge of loose sand deposits was encountered in the east portion of the Project Site, at boring B-2 and B-7 locations to a depth of 20 feet below ground surface, that is preliminarily subject to dynamic settlement. Besides this area, within the east portion of the Project Site where boring B-2 and B-7 occurred, preliminary evaluation of the older alluvial soils underlying the Project Site indicates a low potential for soil collapse and settlement. Further, no subsidence is known to have impacted the Project Site.

Excavation for the subterranean parking would remove the loose sand deposit encountered in the east portion of the Project Site within the footprint of the proposed structures. 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 the planned excavation and construction activities on-site would minimize or avoid any potential site stability geologic hazards at the Project Site and 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 would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving seismic-related ground failure hazards, including liquefaction, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, direct and indirect impacts regarding seismic-related ground failure would be less than significant. No mitigation measures are required.

#### (4) Landslides

The Project Site is relatively flat with a gentle slope which descends from an elevation of 430 feet at the northeast corner of the Project Site down to an elevation of 408 feet at the southwest portion of the Project Site. According to the Geotechnical Feasibility Report, the potential for landsliding and seismically induced slope instability at the Project Site is considered to be low.<sup>59</sup> In addition, the Project Site is not located within a designated landslide area, as shown in the Los Angeles General Plan Safety Element, Exhibit C,

<sup>59</sup> Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, Hollywood District, Los Angeles, California, Section 4.4, page 9, prepared by Group Delta, dated March 2019.

Landslide Inventory and Hillside Areas in the City of Los Angeles and in the City's Zimas database.<sup>60</sup> Further, the Project would not create new significant slopes on the Project Site which would create or be subject to landslide hazards. Therefore, based on the above, development of the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving landslides or other forms of natural slope instability, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, direct and indirect impacts associated with landslides or other forms of natural slope instability on the Project Site would be less than significant. No mitigation measures are required.

### (5) Other Hazards

As shown in the City's Zimas database, the Project Site is not located within a City of Los Angeles Methane Zone or Methane Buffer Zone.<sup>61</sup> Additionally, the Project Site is not located within the limits of an oil field, and no active oil wells have been drilled on the Project Site.<sup>62,63</sup> Thus, the Project would not exacerbate existing environmental conditions related to methane or oil-related hazards. No impacts would occur in related to methane or oil drilling. The deeper excavations would reach a maximum of 408 feet above mean sea level (AMSL), which is above the highest encountered groundwater (376-394 feet AMSL). However, the geotechnical report recommends that potential dewatering be taken into consideration during Project design. Groundwater or dewatering, which is discussed in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, is not anticipated as a geologic hazard.<sup>64</sup>

### (6) Conclusion

State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the risk that buildings would collapse. The Geotechnical Feasibility Report contains a discussion of potential methods of construction and site-specific recommendations for the Project Site, that would be reviewed and approved by the LADBS and implemented before construction. In addition, the LADBS would review a final design-level geotechnical report prior to issuance of any grading, shoring, or building permit for the Project. Adherence to the recommendations of the approved Final Geotechnical Report, as required under Chapter IX LAMC Div. 18, Sec. 91.1803, would ensure seismic risks are adequately reduced through conformity with applicable building codes, in conjunction with other requirements specified in site-specific preliminary and final geotechnical reports, that are reviewed and approved by licensed engineers at the City before development of the Project. **Accordingly, the Project would not cause,**

<sup>60</sup> City of Los Angeles, Zimas Website, available at: <http://zimas.lacity.org/>. Accessed June 2019.

<sup>61</sup> City of Los Angeles Zimas website parcel information for 6220 Yucca Street, available at : <http://zimas.lacity.org/>. Accessed October 20, 2018

<sup>62</sup> California Department of Oil, Gas, and Geothermal Resources, Regional Wildcat Map W1-5, May 26, 2010.

<sup>63</sup> City of Los Angeles Zimas website parcel information for 6220 Yucca Street, available at <http://zimas.lacity.org/>. Accessed June 2019

<sup>64</sup> Group Delta, Updated Geotechnical Feasibility Report, March 2019, page 12.

accelerate, or exacerbate seismic conditions or other geologic conditions on the Project Site or in its vicinity that would result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk or injury. As such, direct and indirect impacts related to surface ground rupture, strong seismic ground shaking, liquefaction, seismic-related ground failure and landslides would be less than significant. No mitigation measures are required.

***Threshold (b): Would the project result in substantial soil erosion or the loss of topsoil?***

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 residential uses and surface parking. Negligible, if any, native topsoil is likely to occur on the Project Site given its current development. 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, as discussed in Section IV.B *Air Quality*. 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 in Section IV.G, *Hydrology and Water Quality*, since the Project would be subject to existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the CBC and the National Pollutant Discharge Elimination System (NPDES) General Construction 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 Project 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, impacts due to erosion of topsoil would be less than significant with compliance with applicable code and regulatory requirements, and no mitigation is required.**

***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?***

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 losing 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 Geotechnical Feasibility Report, the Final Geotechnical Report would recommend a shoring system of soldier piles with internal bracing and/or tied-back anchors and other suitable excavation engineering techniques. Compliance with LAMC Div. 18, Sec. 91.1803 would ensure enforcement of the recommendations of the Final Geotechnical Report.

In addition, as discussed above, the Project Site is not susceptible to liquefaction, lateral spreading, subsidence or impacts associated with landslides or other forms of natural slope instability. **Therefore, based on the above, the Project would not be developed on a geologic unit or on soil that is unstable, or that would become unstable as a result of the Project, so as to create the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts associated with these geologic hazards on the Project Site would be less than significant. No mitigation measures are required.**

***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 risks to life or property?***

As discussed above, geotechnical testing of the older alluvial soils below the surface of the Project Site indicates the clayey alluvium has a high expansion potential. It is also noted in the Geotechnical Feasibility Report that on-site soils have a "severe" (or very high) corrosion potential for buried metal.

Soil corrosivity hazards and stability geologic hazards for the Project Site, including expansive soils, would be further evaluated for the Site as part of the Final Geotechnical Report, which must be approved by LADBS and include site-specific design recommendations for addressing expansive and corrosive soils. Based on the recommendations of the Final Geotechnical Report, including specific evaluation of soil corrosion levels, appropriate options and protections for all underground metal pipes/clamps/structures would be evaluated prior to installation. Further, compliance with

standard construction and engineering practices (i.e., onsite excavation requiring suitable engineered stabilization in accordance with the 2016 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, the Project would not be developed on expansive soils or corrosive soils as to create substantial direct or indirect risks to life or property. **Therefore, Project impacts regarding expansive and corrosive soils would be less than significant. No mitigation measures are required.**

***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 Chapter VI (subsection Impacts Found not to be Significant) and in the Initial Study (Appendix A), the Project would not include the use of septic tanks or alternative waste water disposal systems. The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. Thus, the Project would have no impact with respect to Threshold e. **No impacts associated with septic tanks and soil would occur and no mitigation measures are required. No further analysis is required.**

***Threshold (f): Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?***

The Project Site is currently developed with existing urban uses and there are no unique geological features on the Project Site. Therefore, development of the Project would not directly or indirectly destroy a unique geological feature, and no impacts to unique geological features would occur.

As discussed above, the Project Site contains potentially fossiliferous older Quaternary alluvial fan and fluvial deposits that underlie surficial deposits. Numerous fossil specimens (horse, camel, mastodon, mammoth, and bison) have been encountered in these deposits relatively near the Project Site from depths between five to 12 feet below surface and 47 and 80 feet below the surface. The closest fossil localities (LACM 6297-6300) are situated approximately one-half mile east of the Project Site, along Hollywood Boulevard and between the Hollywood Freeway (US-101) and Western Avenue. Other fossil localities have also been recorded approximately two to three miles south of the Project Site.<sup>65</sup> The Project would include excavation to potential depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending down to approximately 40 feet below ground surface. As a result of these findings, Project grading and excavation in older Quaternary Alluvium deposits have a high potential to

<sup>65</sup> McLeod, Samuel, 2013, Paleontological Records Search for the proposed Palladium Residences Project, in the City of Los Angeles, Los Angeles County, project area.



encounter fossils. **Due to this potential, impacts on paleontological resources are considered potentially significant prior to mitigation. Mitigation Measures MM-PALEO-1 through MM-PALEO-3 are therefore identified to reduce this potentially significant impact to buried/unknown paleontological resources to a less than significant level.**

## e) Cumulative Impacts

### (1) Geological Hazards

Impacts associated with geologic and soil issues are typically confined to a specific site or within a very localized area. As discussed above, development of the Project would not result in significant geology or soils impacts. Like the Project, all related projects must also comply with applicable codes and regulations to reduce seismic-related risks. Also, like the Project, the related projects are generally commercial/residential/or mixed-use projects that would not involve mining operations, blasting, deep excavation into the earth, or boring of large areas that would create unstable seismic conditions or stresses in the earth's crust. Cumulative development in the area would, however, potentially increase the number of people exposed to seismic hazards.<sup>66</sup> The nearest related projects in the immediate Project vicinity are Related Project 5, the Argyle House, located immediately west of the Project Site across Argyle Avenue, which involves the development of condominium units and commercial uses; and Related Project 16, the Kimpton Everly Hotel Project, located immediately north of the Project Site across West Yucca Street. However, for the reasons discussed above, and with adherence to applicable regulations, the Project would not have a cumulatively considerable contribution to impacts in combination with the related projects. Further, all related projects, including future development resulting from the Hollywood Community Plan Update, would be subject to established regulations pertaining to seismic hazards, and would be required to implement construction procedures that would avoid adverse effects at their own and other project sites. As such, adherence to applicable building regulations and standard engineering practices would ensure that development of the Project and related projects would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving strong seismic ground shaking hazards, caused in whole or in part by the Project's or related projects' exacerbation of the existing environmental conditions. **Therefore, cumulative seismic hazards impacts would be less than significant. No mitigation measures are required.**

### (2) Paleontological Resources

Generally, impacts to paleontological resources are project site-specific, and are not generally cumulatively considerable. Moreover, related projects with the potential for substantial excavation would likely be subject to environmental review, and if the potential

<sup>66</sup> Under the California Supreme Court's 2015 decision in *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4<sup>th</sup> 369. CEQA does not require an EIR to assess the environment's impacts on a project. Therefore, this analysis is provided for informational purposes, only.

for significant impacts on paleontological resources were identified given the site characteristics and development programs of the related projects, mitigation measures would be implemented. These measures would, consistent with City standard practice, include monitoring programs that would include appropriate treatment and curation of inadvertently discovered fossils. Further, the City's mitigation measures would ensure that those projects' incremental impacts would be less than significant and not cumulatively considerable. Therefore, the cumulative effects from related projects are considered less than significant.

The Project is required to implement Mitigation Measures MM-PALEO-1 through MM-PALEO-3, thus ensuring proper identification, treatment and preservation of any inadvertently encountered resources, which would reduce any potentially significant impacts on paleontological resources to less than significant levels. These measures require construction monitoring of excavation activities, and treatment and curation of discoveries, if encountered. **Therefore, to the extent impacts on paleontological resources from related projects may occur, any contribution from the Project would not be cumulatively considerable.**

## f) Mitigation Measures

### (1) Geology and Soils

Project impacts regarding geology and soils would be less than significant. Therefore, no mitigation measures are required.

### (2) Paleontological Resources

The following mitigation measures are identified to reduce the Project's potential impacts to buried/unknown paleontological resources to a less than significant level.

**MM-PALEO-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010)<sup>67</sup> to develop and implement a paleontological monitoring program for construction excavations that would encounter the fossiliferous older Quaternary alluvium deposits (associated with sediments below five feet deep across the Project Site). The Qualified Paleontologist shall attend a pre-grade meeting to discuss a paleontological monitoring program. The Qualified Paleontologist shall supervise a paleontological monitor who shall be present during construction excavations into older Quaternary alluvium deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and

<sup>67</sup> Society of Vertebrate Paleontology, "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" (SVP, 1995/2010), available at: [http://vertpaleo.org/The-Society/Governance-Documents/SVP\\_Impact\\_Mitigation\\_Guidelines.aspx](http://vertpaleo.org/The-Society/Governance-Documents/SVP_Impact_Mitigation_Guidelines.aspx). Accessed June 2019.

shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older Quaternary alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified Paleontologist.

**MM-PALEO-2:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the qualified Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation of the find. If preservation in place is not a feasible treatment measure, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from the Project Site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Los Angeles County Natural History Museum, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

**MM-PALEO-3:** Prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

## **g) Level of Significance After Mitigation**

### **(1) Geology and Soils**

Project-level and cumulative impacts with regard to geology and soils would be less than significant without mitigation.

## (2) Paleontological Resources

The Project would not directly or indirectly destroy a unique geologic feature. The implementation of mitigation measures MM-PALEO-1 through MM-PALEO-3, above, which would be consistent with Society of Vertebrate Paleontology's "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" (2010), would provide for avoidance and recovery of resources if an inadvertent encounter were to occur. Therefore, potentially significant impacts to paleontological resources would be reduced to a less than significant level. Cumulative impacts would also be less than significant.

## **IV. Environmental Impact Analysis**

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### **F. Greenhouse Gas Emissions**

#### **1. Introduction**

This section of this Draft EIR determines the Project's potential to create a significant impact, including its potential to contribute to a significant cumulative climate change impact, related to its greenhouse gas (GHG) emissions generated during construction and operations, inclusive of mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project's design. The analysis assesses 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 to reduce GHG emissions. It also quantifies and addresses the Project's estimated GHG emissions. The Project's potential to contribute to global climate change is discussed. Details regarding the GHG analysis included in this Section are provided in the Greenhouse Gas Technical Appendix, which is attached as Appendix G to this Draft EIR.

#### **2. Environmental Setting**

Global climate change refers to changes in average climatic conditions across the 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 indicate 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 and the world. The extent to which increased concentrations of GHGs have caused or will cause adverse climate changes and the appropriate actions to limit and/or respond to these climate changes and their effects are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are those compounds in the Earth's atmosphere that are considered to play a critical role in determining temperatures near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere but to retain some of the low-frequency infrared energy, which is radiated back from the Earth toward space, resulting in a warming of the atmosphere. Not all GHGs possess the same ability to induce these temperature changes; as a result, GHG contributions are commonly quantified in the units of equivalent mass of carbon dioxide (CO<sub>2</sub>e). Mass emissions are calculated by converting pollutant-specific emissions to CO<sub>2</sub>e emissions by applying the

proper global warming potential (GWP) value.<sup>1</sup> By applying the GWP ratios, Project-related CO<sub>2</sub>e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO<sub>2</sub> over a 100-year period is used as a baseline. The CO<sub>2</sub>e values are calculated for construction years, as well as existing and Project build-out conditions in order to generate a net change in GHG emissions for construction and operation. Compounds that are regulated as GHGs are discussed below.<sup>2,3</sup>

**Carbon Dioxide (CO<sub>2</sub>):** CO<sub>2</sub> is the most abundant GHG in the atmosphere and is primarily generated by fossil fuel combustion from stationary and mobile sources. CO<sub>2</sub> is the reference gas (GWP of 1) for determining the GWPs of other GHGs.<sup>4</sup>

**Methane (CH<sub>4</sub>):** CH<sub>4</sub> is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The GWP of CH<sub>4</sub> is 21 in the IPCC SAR and 25 in the IPCC AR4.<sup>5</sup>

**Nitrous Oxide (N<sub>2</sub>O):** N<sub>2</sub>O is produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N<sub>2</sub>O is 310 in the IPCC SAR and 298 in the IPCC AR4.<sup>6</sup>

**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.<sup>7</sup>

<sup>1</sup> GWPs and associated CO<sub>2</sub>e 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 are consistent with international reporting standards.

<sup>2</sup> Intergovernmental Panel on Climate Change, Second Assessment Report, Working Group I: The Science of Climate Change, 1995, <https://www.ipcc.ch/site/assets/uploads/2018/06/2nd-assessment-en.pdf>. Accessed June 2019.

<sup>3</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, 2007, [https://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4\\_wg1\\_full\\_report.pdf](https://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4_wg1_full_report.pdf). Accessed June 2019.

<sup>4</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

<sup>5</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

<sup>6</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

<sup>7</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

**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.<sup>8</sup>

**Sulfur Hexafluoride (SF<sub>6</sub>):** SF<sub>6</sub> is a fluorinated compound consisting of sulfur and fluoride. It is a colorless, odorless, nontoxic, and nonflammable gas. It is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF<sub>6</sub> has a GWP of 23,900 in the IPCC SAR and 22,800 in the IPCC AR4.<sup>9</sup>

## 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<sub>2</sub> 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) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

#### (a) Clean Air Act

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), the United States Supreme Court held in April of 2007 that the USEPA has statutory authority under Section 202 of the Clean Air Act (CAA) to regulate GHGs. The Court did not hold 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<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) 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

<sup>8</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

<sup>9</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

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.<sup>10</sup>

(c) *Executive Order 13432*

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the President signed Executive Order 13432 on May 14, 2007, directing the USEPA, along with the Departments of Transportation, Energy, and Agriculture, to initiate a regulatory 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. 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 applies to passenger cars and light-duty trucks for model years 2012 through 2016. The

<sup>10</sup> 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.



rule surpasses the prior Corporate Average Fuel Economy standard (CAFE)<sup>11</sup> of 27.3 miles per gallon (mpg) from the 2009 standards and requires an average fuel economy standard of 35.5 mpg and 250 grams of CO<sub>2</sub> 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 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO<sub>2</sub> per mile. According to the USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.<sup>12</sup> In 2017, the USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025.

In August 2018, the EPA proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule that would, if adopted, maintain the CAFE and CO<sub>2</sub> 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 22 other states and environmental groups in September 2019 in U.S. District Court in Washington, filed lawsuits to challenge the Federal determination in September that California cannot set vehicle emission standards and zero-emission vehicle mandates. The Court has not yet ruled on the lawsuits.

## (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) *Executive Order S-3-05 and Executive Order B-30-15*

California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:<sup>13</sup>

- By 2010, California shall reduce GHG emissions to 2000 levels;

<sup>11</sup> 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.

<sup>12</sup> United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF>. Accessed June 2019.

<sup>13</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 1. [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed March 2018.

- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate the efforts of the various agencies in order to collectively and efficiently reduce GHGs. Some of the agency representatives involved in the GHG reduction plan include the Secretary of the Business, Transportation and Housing Agency, the Secretary of the Department of Food and Agriculture, the Secretary of the Resources Agency, the Chairperson of CARB, the Chairperson of the California Energy Commission, and the President of the Public Utilities Commission. Representatives from these agencies comprise the California Climate Action Team (CCAT).

The CCAT provides biennial 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 CCAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in Executive Order S-3-05.<sup>14</sup> The 2010 CCAT Report, finalized in December 2010, expands on the policy oriented 2006 assessment.<sup>15</sup> The information detailed in the CCAT Report includes development of climate and sea-level projections and an evaluation of climate change within the context of broader social changes, such as land-use changes and demographic shifts.

On April 29, 2015, California Governor Brown issued Executive Order B-30-15, which involved the following:<sup>16</sup>

- 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.

*(b) Executive Order B-55-18*

Executive Order B-55-18 was signed by Governor Brown on September 10, 2018.<sup>17</sup> The order establishes an additional statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB to

<sup>14</sup> California Environmental Protection Agency, California Climate Action Team Report to the Governor and the Legislature, 2006, [https://www.climatechange.ca.gov/climate\\_action\\_team/reports/#2006](https://www.climatechange.ca.gov/climate_action_team/reports/#2006), Accessed June 2019.

<sup>15</sup> California Environmental Protection Agency, California Climate Action Team Report to the Governor and the Legislature, 2010.

<sup>16</sup> Office of Governor Edmund G. Brown Jr., Executive Order B-30-15, 2015, <https://www.ca.gov/archive/gov39/2015/04/29/news18938/index.html>. Accessed April 2019.

<sup>17</sup> Office of Governor Edmund G. Brown Jr., Executive Order B-55-18, 2018, <https://www.californiabiodiversityinitiative.org/pdf/executive-order-b-55-18.pdf>. Accessed April 2019.

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.

(c) *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. HSC Division 25.5 defines regulated GHGs as CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub> 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 HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required 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 reduction goal for the year 2030. SB 32 and AB 197 amend HSC Division 25.5, establish a new GHG reduction target of 40 percent below 1990 levels by 2030, and include provisions to ensure that the benefits of State climate policies reach into disadvantaged communities. 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.

(d) *Climate Change Scoping Plan*

AB 32 requires CARB 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's initial Scoping Plan, which was approved in 2008<sup>18</sup>, contained a mix of recommended strategies to achieve the 2020 emissions cap. These strategies 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.<sup>19</sup>

In its 2008 Climate Change Scoping Plan, CARB acknowledged that land use-driven emissions are highly complex: "While it is possible to illustrate the [GHG] inventory many different ways, no chart or graph can fully display how diverse economic sectors fit

<sup>18</sup> California Air Resources Board, Climate Change Scoping Plan: A Framework for Change, December 2008, [https://www.arb.ca.gov/cc/scopingplan/document/adopted\\_scoping\\_plan.pdf](https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf). Accessed June 2019.

<sup>19</sup> Office of Governor Edmund G. Brown Jr., Governor Brown Establishes Most Ambitious Greenhouse Gas Reduction Target in North America, 2015.

together. California's economy is a web of activity where seemingly independent sectors and subsectors operate interdependently and often synergistically." GHG emissions and reductions in the land use sector are complicated to assess given that emissions are influenced by reduction measures separate from the land use sector, such as the Los Carbon Fuel Standards (LCFS), vehicle emissions standards, and entities regulated under the Cap-and-Trade program, including refineries and utility providers. These measures will affect other sectors of the economy and will also impact existing development in addition to new land use development.<sup>20</sup>

As required by AB 32 and SB 32, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions reduction target for 2020. The 2020 emissions reduction target was originally set at 427 million metric tons (MMT) of CO<sub>2</sub>e 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<sub>2</sub>e (using GWP values from the IPCC SAR). Therefore, under the original projections, the State would have had to reduce its 2020 NAT emissions by 28.4 percent in order to meet the 1990 target of 427 MMTCO<sub>2</sub>e.

*(i) First Update to the Climate Change Scoping Plan*

The First Update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations.<sup>21</sup> In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined the 1990 GHG emissions inventory and 2020 GHG emissions limit to be 431 MMTCO<sub>2</sub>e.<sup>22</sup> 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 had recently been adopted for motor vehicles and renewable energy.<sup>23</sup> CARB's projected statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 MMTCO<sub>2</sub>e.<sup>24</sup>

Therefore, under the first update to the Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO<sub>2</sub>e would have been 78.4 MMTCO<sub>2</sub>e, or a reduction of GHG emissions by approximately 15.4 percent.

<sup>20</sup> See subsection (l), below, for a detailed description of the Cap-and-Trade Program.

<sup>21</sup> California Air Resources Board, First Update to the AB 32 Scoping Plan, 2013, <https://www.arb.ca.gov/cc/scopingplan/document/updatescopingplan2013.htm>. Accessed February 2019.

<sup>22</sup> California Air Resources Board, First Update to the AB 32 Scoping Plan, 2013, <https://www.arb.ca.gov/cc/scopingplan/document/updatescopingplan2013.htm>. Accessed February 2019.

<sup>23</sup> California Air Resources Board, First Update to the AB 32 Scoping Plan, 2013, <https://www.arb.ca.gov/cc/scopingplan/document/updatescopingplan2013.htm>. Accessed February 2019.

<sup>24</sup> California Air Resources Board, First Update to the AB 32 Scoping Plan, 2013, <https://www.arb.ca.gov/cc/scopingplan/document/updatescopingplan2013.htm>. Accessed February 2019.

(ii) *2017 Climate Change Scoping Plan*

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target of reducing GHG emissions 40 percent below 1990 levels, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Scoping Plan) at a public meeting held in December 2017.<sup>25</sup> Taking into account 2020 GHG reduction policies and programs,<sup>26</sup> the 2017 Scoping Plan "establishes a path that will get California to its 2030 target."<sup>27</sup> It also includes a description of the "suite of specific actions to meet the State's 2030 GHG limit"<sup>28</sup> of 40 percent below 1990 levels. These specific strategies, are listed in Table 17 on pages 103 and 104 of the 2017 Scoping Plan, which includes existing programs, programs required by statutes and a post-2020 cap-and-trade program.<sup>29</sup> This scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398,<sup>30</sup> including removal of the 20 percent refinery measure.<sup>31</sup>

CARB states that the Scoping Plan Scenario "is the best choice to achieve the State's climate and clean air goals."<sup>32</sup> Under the Scoping Plan Scenario, the majority of the reductions would result from the continuation of the Cap-and-Trade regulation.<sup>33</sup> Additional reductions would be achieved from electricity sector standards (i.e., utility providers to supply 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.<sup>34</sup> The alternatives considered under the 2017 Scoping Plan were designed to consider various combinations of these programs, as well as a carbon tax in the event the Cap-and-Trade regulation was not continued.<sup>35</sup> However, as mentioned above, in July 17, 2017 the California legislature passed Assembly Bill 398, extending the Cap-and-Trade program through 2030. A summary of the GHG

<sup>25</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed March 2018.

<sup>26</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 5-6. Accessed March 2019.

<sup>27</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. E-3. Accessed March 2019.

<sup>28</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 5. Accessed March 2019.

<sup>29</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 24. Accessed March 2019.

<sup>30</sup> 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.

<sup>31</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 23. Accessed March 2019.

<sup>32</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, p. 22.

<sup>33</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 55. Accessed June 2019.

<sup>34</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 55. Accessed June 2019.

<sup>35</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 23. Accessed March 2019.

emissions reductions required under AB 32 and SB 32 is provided in **Table IV.F-1, Estimated Greenhouse Gas Emissions Reductions Required by AB 32 and SB 32.**

**TABLE IV.F-1**  
**ESTIMATED GREENHOUSE GAS EMISSIONS REDUCTIONS REQUIRED BY AB 32 AND SB 32**

<b>Emissions Scenario</b>	<b>GHG Emissions (MMTCO<sub>2</sub>e)</b>
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%) <sup>a</sup>
2011 Scoping Plan (IPCC AR4)	
2020 NAT Forecast (CARB 2011 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%) <sup>b</sup>
2017 Scoping Plan Update	
2030 NAT Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by HSC Division 25.5 (i.e., 40% below 1990 Level)	260
Reduction below NAT Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) <sup>c</sup>

*MMTCO<sub>2</sub>e = million metric tons of carbon dioxide equivalents*

<sup>a</sup>  $596 - 427 = 169 / 596 = 28.4\%$

<sup>b</sup>  $509.4 - 431 = 78.4 / 509.4 = 15.4\%$

<sup>c</sup>  $389 - 260 = 129 / 389 = 33.2\%$

SOURCE: California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; California Air Resources Board, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition, 2017, <http://www.arb.ca.gov/cc/inventory/data/bau.htm>. Accessed February 2019; California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed March June 2019.

Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 MMTCO<sub>2</sub> of the 2030 reduction obligation.<sup>36</sup> The short-lived GHG strategy is expected to cover approximately 17 to 35 MMTCO<sub>2</sub>e.<sup>37</sup> The Renewables Portfolio Standard with 50 percent renewable electricity

<sup>36</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Appendix G, November 2017, p. 9.

<sup>37</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Appendix G, November 2017, p. 9.

by 2030 is expected to cover approximately 3 MMTCO<sub>2</sub>.<sup>38</sup> 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<sub>2</sub>.<sup>39</sup> Under the Scoping Plan Scenario, CARB expects that the doubling of the energy efficiency savings by 2030 would cover approximately 7 to 9 MMTCO<sub>2</sub> of the 2030 reduction obligation.<sup>40</sup> The other strategies would be expected to cover the remaining 2030 reduction obligations.<sup>41</sup>

The 2017 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals since 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.<sup>42</sup> Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.<sup>43</sup>

The City of Los Angeles has not developed per capita targets for 2030 or 2050; however, the City recognizes that GHG emissions reductions are necessary in the public and private sectors. The City has taken the initiative in combatting climate change by developing programs, such as the *Green New Deal (Sustainability City pLAN 2019)* and the *Green Building Code*. Each of these programs is discussed further in subsections IV.F.3.d)(1)(a)(iv)(a), and IV.F.3.d)(1)(a)(iv)(b) below.

(e) *California Assembly Bill No. 1493 (AB 1493, Pavley)*  
(Chapter 200, Statutes of 2002)

In response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions, AB 1493 (Chapter 200, Statutes of 2002), 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.<sup>44</sup> As discussed previously, the USEPA and U.S. Department of Transportation (USDOT) adopted federal standards for model year 2012 through 2016

<sup>38</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Appendix G, November 2017, p. 9.

<sup>39</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Appendix G, November 2017, p. 9.

<sup>40</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Appendix G, November 2017, p. 9.

<sup>41</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Appendix G, November 2017, p. 9.

<sup>42</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, p. 97.

<sup>43</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, p. 97.

<sup>44</sup> California Air Resources Board, Regulations to Control Greenhouse Gas Emissions from Motor Vehicles, Final Statement of Reasons, 2005, <https://www.arb.ca.gov/regact/grnhsgas/fsor.pdf>. Accessed February 2019.

light-duty vehicles. The State standards (called the Pavley standards) require additional reductions in CO<sub>2</sub> emissions beyond model year 2016 (referred to as Pavley Phase II standards).<sup>45</sup> However, as discussed above, the USEPA published the 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 22 other states and environmental groups in September 2019 in U.S. District Court in Washington, filed lawsuits to challenge the Federal determination in September that California cannot set vehicle emission standards and zero-emission vehicle mandates. The Court has not yet ruled on the lawsuits.

(f) *Executive Order S-01-07*

Executive Order S-01-07 was enacted by the Governor on January 18, 2007.<sup>46</sup> The order mandates the following: (1) that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) that a LCFS for transportation fuels be established in California. 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.<sup>47</sup> In the proposed 2017 Climate Change Scoping Plan Update, CARB's preferred recommendation includes increasing the stringency of the LCFS by reducing the carbon intensity of transportation fuels by 18 percent by 2030, up from the current target of 10 percent by 2020.<sup>48</sup> 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*.<sup>49</sup> Final approval of regulatory changes from CARB's analysis of nitrogen dioxide impacts from biodiesel fuels was made on January 4, 2019.<sup>50</sup>

<sup>45</sup> On March 24, 2017, CARB voted unanimously to uphold the State's model year 2017-2025 cars and light truck emissions standards. See: California Air Resources Board, CARB finds vehicle standards are achievable and cost-effective, March 24, 2017, <https://ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective>. Accessed June 2019.

<sup>46</sup> Office of the Governor, Executive Order S-01-07, <https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf>, 2007. Accessed June 2019.

<sup>47</sup> California Air Resources Board, Low Carbon Fuel Standard, 2018, <https://www.arb.ca.gov/fuels/lcfs/lcfs.htm>. Accessed June 2019.

<sup>48</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, p. 22.

<sup>49</sup> California Air Resources Board, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation 2019.

<sup>50</sup> California Air Resources Board, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation 2019.



(g) *Senate Bill 97 (SB 97, Dutton) (Chapter 185, Statutes of 2007)*

Senate Bill (SB) 97 (Chapter 185, Statutes of 2007), enacted in 2007, amended CEQA to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. It directed the California Office of Planning and Research (OPR) to develop revisions to the State CEQA Guidelines “for the mitigation of GHG emissions or the effects of GHG emissions” and directed the Natural Resources Agency to certify and adopt these revised State CEQA Guidelines by January 2010. The first set of revisions were completed in March 2010 and codified into the California Code of Regulations (CCR) and became effective within 120 days pursuant to CEQA. A second set of revisions “intended to reflect recent case law and existing practice” became effective December 28, 2018.<sup>51</sup>

As a result of these amendments, the State CEQA Guidelines provide regulatory guidance for the analysis and mitigation of the potential effects of GHG emissions. The State CEQA Guidelines require:

- Inclusion of GHG analyses in CEQA documents;
- Determination of significance of GHG emissions; and
- If significant GHG emissions would occur, adoption of mitigation to address significant emissions.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the amendments.<sup>52</sup> As such, Section 15064.4 of the State CEQA Guidelines requires 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, and gives discretion to the lead agency to choose whether to: (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, Section 15064.4 identifies 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

<sup>51</sup> Office of Planning and Research, *Discussion Draft, CEQA and Climate Change Advisory* December 2018, p. 5, [http://opr.ca.gov/docs/20181228-Discussion\\_Draft\\_Climate\\_Change\\_Advisory.pdf](http://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Advisory.pdf). Accessed June 2019.

<sup>52</sup> Office of Planning and Research, *Discussion Draft, CEQA and Climate Change Advisory* June 2019, p. 5, [http://opr.ca.gov/docs/20181228-Discussion\\_Draft\\_Climate\\_Change\\_Advisory.pdf](http://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Advisory.pdf). Accessed June 2019.

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.

The administrative record for the 2009 amendments clarified “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.”<sup>53</sup> Subsequently, the California Supreme Court agreed and explained, “because of the global scale of climate change, any one project’s contribution is unlikely to be significant by itself.” *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512. “The question therefore becomes whether the project’s incremental addition of greenhouse gases is ‘cumulatively considerable’ in light of the global problem, and thus significant.” *Cleveland National Forest Foundation*, supra, at page 512. Under Section 15064.4(b), a project’s significant GHG emissions must be disclosed and mitigated to the extent feasible when the lead agency determines that the project would contribute to a significant cumulative climate change impact.<sup>54</sup>

Appendix F of the State CEQA Guidelines states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F of the State CEQA Guidelines further states that a project’s energy consumption and proposed conservation measures should 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. In accordance with Appendix F of the State CEQA Guidelines, relevant information that addresses the energy implications of the Project is provided in Section IV.D, *Energy*, of this Draft EIR.

(h) *Senate Bill 375 (SB 375, Steinberg) (Chapter 728, Statutes of 2008)*

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organizations (MPO), 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 of 8 percent by 2020 and 13 percent by 2035 relative to 2005 GHG emissions for SCAG, which is the MPO for the region in which the City of Los Angeles is located.<sup>55</sup> Of note, the proposed

<sup>53</sup> Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, Natural Resources Agency, dated April 13, 2009, Available at: [http://www.opr.ca.gov/docs/Transmittal\\_Letter.pdf](http://www.opr.ca.gov/docs/Transmittal_Letter.pdf). Accessed February 2019.

<sup>54</sup> See also Office of Planning and Research, *Discussion Draft, CEQA and Climate Change Advisory* June 2019, p. 5, [http://opr.ca.gov/docs/20181228-Discussion\\_Draft\\_Climate\\_Change\\_Advisory.pdf](http://opr.ca.gov/docs/20181228-Discussion_Draft_Climate_Change_Advisory.pdf). Accessed June 2019.

<sup>55</sup> California Air Resources Board, Executive Order No. G-11-024, February 15, 2011, [https://www.arb.ca.gov/cc/sb375/executive\\_order\\_g11024.pdf](https://www.arb.ca.gov/cc/sb375/executive_order_g11024.pdf). Accessed June 2019.

reduction targets explicitly exclude emission reductions expected from the AB 1493 and the LCFS regulations.

Under SB 375, the 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 plans) 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 (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 integrating land use and transportation strategies 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.

*(i) Title 24, Building Standards Code and CALGreen Code*

The California Energy Commission (CEC) first adopted the 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 to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2016 update to 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 2016 update requires that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.<sup>56</sup>

Part 11 of the Title 24 Building 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

<sup>56</sup> California Energy Commission, 2016 Building Energy Efficiency Standards, June 2015, <http://www.energy.ca.gov/title24/2016standards/>. Accessed June 2019.

categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”<sup>57</sup> 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. When the CALGreen Code went into effect in 2009, compliance through 2010 was voluntary. 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.<sup>58</sup> The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential, as well as nonresidential uses; the new measures took effect on January 1, 2017 with supplemental changes on July 1, 2018.<sup>59</sup>

(j) *Renewables Portfolio Standard*

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which expands the State's Renewables Portfolio Standard (RPS) to 33 percent renewable power by 2020. Pursuant to Executive Order S-21-09, CARB was also preparing regulations to supplement the RPS with a Renewable Energy Standard that will result in a total renewable energy requirement for utilities of 33 percent by 2020. However, on April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California's RPS to 33 percent by 2020. SB 350 (Chapter 547, Statutes of 2015) further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 was signed into law on October 7, 2015. The 2017 Climate Change Scoping Plan incorporated the SB 350 standards and estimated the GHG reductions would account for approximately 21 percent of the Scoping Plan reductions.<sup>60</sup>

On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's Renewables Portfolio Standard 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

<sup>57</sup> California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

<sup>58</sup> California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

<sup>59</sup> California Building Standards Commission, CALGreen (Part 11 of Title 24), 2016, [https://codes.iccsafe.org/content/document/657?site\\_type=public](https://codes.iccsafe.org/content/document/657?site_type=public). Accessed June 2019.

<sup>60</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Table 3, November 2017, p. 31. Calculated as:  $(108 - 53) / 260 = 21$  percent.

31, 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.<sup>61</sup>

*(k) California Air Resources Board*

The California Air Resources Board (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. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (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 State Implementation Plan (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 Clean Air Act. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions to 1990 levels by 2020.

*(l) Cap-and-Trade Program*

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions and help California meet its GHG reduction targets for 2020 and 2030 and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program<sup>62</sup> pursuant to its authority under AB 32. The development of this Program included a multi-year stakeholder process and consideration of potential impacts on disproportionately impacted communities. The Cap-and-Trade Program is designed 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. The statewide cap for GHG emissions from the capped sectors<sup>63</sup> (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration. On July

<sup>61</sup> California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases, [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180SB100](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100). Accessed June 2019.

<sup>62</sup> 17 CCR §§ 95800 to 96023.

<sup>63</sup> See generally 17 CCR §§ 95811, 95812.

17, 2017 the California legislature passed Assembly Bill 398, extending the Cap-and-Trade program through 2030.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 MTCO<sub>2</sub>e per year must comply with the Cap-and-Trade Program.<sup>64</sup> Triggering of the 25,000 MTCO<sub>2</sub>e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or “MRR”).<sup>65</sup>

Each covered entity with a compliance obligation is required to surrender “compliance instruments”<sup>66</sup> for each MTCO<sub>2</sub>e of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), buy allowances at auction, purchase allowances from others, or purchase offset credits. A “compliance period” is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 were the first compliance period, the years 2015–2017 were the second compliance period, and the third compliance period is from 2018–2020. At the end of each compliance period, each facility will be required to surrender compliance instruments to CARB equivalent to their total GHG emissions throughout the compliance period. There also are requirements to surrender compliance instruments covering 30 percent of the prior year’s compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30 percent of its 2013 GHG emissions.

The Cap-and-Trade Regulation 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. As summarized by CARB in its First Update to the Climate Change Scoping Plan:

*The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. **But as the cap declines, aggregate emissions must be reduced.***<sup>67</sup>

<sup>64</sup> 17 CCR § 95812.

<sup>65</sup> 17 CCR §§ 95100-95158.

<sup>66</sup> Compliance instruments are permits to emit, the majority of which will be “allowances,” but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.

<sup>67</sup> CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 86 (May 2014) (emphasis added).

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program. However, as climate change is a global phenomenon and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions is warranted.

Further, the reductions in GHG emissions that will be achieved by the Cap-and-Trade Program inherently are variable and, therefore, impossible to quantify with precision:

*The Cap-and-Trade Regulation is different from most of the other measures in the Scoping Plan. The [R]egulation sets a hard cap, instead of an emission limit, so the emission reductions from the program vary as our estimates of “business as usual” emissions in the future are updated. In addition, the Cap-and-Trade Program works in concert with many of the direct regulatory measures—providing an additional economic incentive to reduce emissions. Actions taken to comply with direct regulations reduce an entity’s compliance obligation under the Cap-and-Trade Regulation. So, for example, increased deployment of renewable electricity sources reduces a utility’s compliance obligation under the Cap-and-Trade Regulation.<sup>68</sup>*

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 achieves 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.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.<sup>69</sup> Accordingly, for projects that are subject to CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period.<sup>70</sup>

<sup>68</sup> CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 86 (May 2014) (emphasis added).

<sup>69</sup> 17 CCR § 95811(b).

<sup>70</sup> 17 CCR §§ 95811, 95812(d).

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are “supplied” (i.e., delivered into commerce). However, transportation fuels that are “supplied” in California but can be demonstrated to have a final destination outside California do not generate a compliance obligation. The underlying concept here is that CARB is seeking to capture tailpipe GHG emissions from the combustion of transportation fuels supplied to California end-users. Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle combustion of transportation fuels are covered by the Cap-and-Trade Program.

In July 2018, statewide GHG emissions fell below 1990 levels for the first time since emissions peaked in 2004. In 1990, statewide emissions were 431 million metric tons. The State's 2016 inventory (published in July 2018) showed that California emitted 429 MMT of climate pollutants in 2016, which represents a drop of 12 MMT, or three percent, from 2015.<sup>71</sup>

### (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 Geronio 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. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

The SCAQMD adopted a “Policy on Global Warming and Stratospheric Ozone Depletion” on April 6, 1990.<sup>72</sup> 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:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;

<sup>71</sup> California Air Resources Board, “Climate Pollutants Fall Below 1990 Levels for First Time,” released July 11, 2018, <https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time>. Accessed June 2019.

<sup>72</sup> South Coast Air Quality Management District, SCAQMD’s Historical Activity on Climate Change, <http://www.aqmd.gov/nav/about/initiatives/climate-change>. Accessed June 2019.



- 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.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.<sup>73,74</sup> On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold 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). A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.<sup>75</sup> However, 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 2016-2040 RTP/SCS*

On April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS, which is an update to the previous 2012-2035 RTP/SCS.<sup>76</sup> Using growth forecasts and economic trends, the 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 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.<sup>77</sup> Compliance with and implementation of 2016-2040 RTP/SCS policies and strategies would have the co-

<sup>73</sup> South Coast Air Quality Management District, Board Meeting, December 5, 2008, Agenda No. 31, <http://www3.aqmd.gov/hb/2008/December/0812ag.html>. Accessed June 2019.

<sup>74</sup> South Coast Air Quality Management District, Greenhouse Gases, CEQA Significance Thresholds, Board Letter – Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008, Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2). Accessed February 2019. The performance standards primarily focus on energy efficiency measures beyond Title 24 and a screening level of 3,000 MTCO<sub>2</sub>e per year for residential and commercial sector projects. The SCAQMD adopted a GHG significance threshold of 10,000 MTCO<sub>2</sub>e per year for industrial stationary source projects for which the SCAQMD is the lead agency.

<sup>75</sup> South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, 2018.

<sup>76</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.

<sup>77</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016.

benefits of reducing per capita criteria air pollutant emissions associated with reduced per capita vehicle miles traveled (VMT).

The 2016-2040 RTP/SCS states that the SCAG region is home to approximately 18.3 million people in 2012 and currently includes 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-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, account for 3 percent of regional total land but are projected to accommodate 46 percent future housing growth and 55 percent of employment growth between 2012 and 2040.<sup>78</sup> The 2016-2040 RTP/SCS overall land use pattern reinforces the 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 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.<sup>79</sup>

In addition, the 2016-2040 RTP/SCS includes strategies to promote active transportation, supports 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

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<sup>78</sup> Southern California Association of Governments, 2016-2040 RTP/SCS, p. 20, 75-77.

<sup>79</sup> Southern California Association of Governments, 2016-2040 RTP/SCS, p. 170-181.

RTP/SCS, if implemented, would achieve the 2020 and 2035 GHG emission reduction targets established by CARB.<sup>80,81</sup>

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 approximate 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.

#### (4) Local

##### (a) *L.A.'s Green New Deal (Sustainable City pLAn 2019)*

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.<sup>82</sup> L.A.'s Green New Deal 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 tackles the climate emergency with accelerated targets and new aggressive goals.

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.

<sup>80</sup> Southern California Association of Governments, 2016-2040 RTP/SCS, p. 170-181.

<sup>81</sup> California Air Resources Board, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016, [https://www.arb.ca.gov/cc/sb375/scag\\_executive\\_order\\_g\\_16\\_066.pdf](https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf). Accessed February 2019.

<sup>82</sup> City of Los Angeles. LA's Green New Deal, 2019.

- 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).
- 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 is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

*(b) City of 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 alternations to residential and non-residential buildings.

*(c) City of Los Angeles General Plan*

The City does not have a General Plan Element specific to climate change and GHG emissions, and its General Plan does not have any stated goals, objectives, or policies specifically addressing climate change and GHG emissions. However, the following five goals from the City's General Plan Air Quality Element would also lead to GHG emission reductions:<sup>83</sup>

- Less reliance on single-occupancy 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;

<sup>83</sup>City of Los Angeles, Air Quality Element, June 1991, pages IV-1 to IV-4, [https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air\\_Quality\\_Element.pdf](https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf). Accessed June 2019.

- 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 implement 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.

## b) Existing Conditions

### (1) Existing Statewide Greenhouse Gas Emissions

The California Air Resources Board (CARB) compiles GHG inventories for the State of California. Based on the 2017 GHG inventory data (i.e., the latest year for which data are available from CARB) prepared by CARB in 2019, California emitted 429.1 MMTCO<sub>2e</sub> including emissions resulting from imported electrical power.<sup>84</sup> Between 1990 and 2017, the population of California grew by approximately 9.7 million (from 29.8 to 39.5 million).<sup>85,86</sup> 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 over three times the 1990 gross state product.<sup>87</sup> 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, Low Carbon Fuel Standard, 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 California Health and Safety Code (HSC), Division 25.5, also known as The Global Warming Solutions Act of 2006 (AB 32).<sup>88</sup> **Table IV.F-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.

<sup>84</sup> California Air Resources Board, California Greenhouse Gas Inventory for 2000-2017– by Category as Defined in the 2008 Scoping Plan, 2019.

<sup>85</sup> U.S. Census Bureau, National and State Population Estimates: 1990-1994 (1995), <https://www.census.gov/prod/1/pop/p25-1127.pdf>. Accessed June 2019.

<sup>86</sup> 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](http://www.dof.ca.gov/Reports/Demographic_Reports/American_Community_Survey/documents/Web_ACS2017_Pop-Race.xlsx). Accessed February 2020.

<sup>87</sup> California Department of Finance, Gross State Product, [http://www.dof.ca.gov/Forecasting/Economics/Indicators/Gross\\_State\\_Product/documents/CA\\_GDP.xlsx](http://www.dof.ca.gov/Forecasting/Economics/Indicators/Gross_State_Product/documents/CA_GDP.xlsx). Accessed February 2020. Amounts are based on current dollars as of the date of the report (May 2019).

<sup>88</sup> California Air Resources Board, Frequently Asked Questions for the 2016 Edition California Greenhouse Gas Emission Inventory, 2016, [https://www.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2014/ghg\\_inventory\\_faq\\_20160617.pdf](https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2014/ghg_inventory_faq_20160617.pdf). Accessed June 2019.

**TABLE IV.F-2  
STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS**

<b>Category</b>	<b>Total 1990 Emissions using IPCC SAR (MMTCO<sub>2</sub>e)</b>	<b>Percent of Total 1990 Emissions</b>	<b>Total 2017 Emissions using IPCC AR4 (MMTCO<sub>2</sub>e)</b>	<b>Percent of Total 2017 Emissions</b>
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 <sup>a</sup>	—	—	8.9	2%
High GWP/Non-Specified <sup>b</sup>	1.3	<1%	20.0	5%
Agriculture/Forestry	23.6	6%	32.4	8%
Forestry Sinks	-6.7		-- <sup>c</sup>	--
<b>Net Total (IPCC SAR)</b>	<b>426.6</b>	<b>100%</b>	<b>--</b>	<b>--</b>
<b>Net Total (IPCC AR4) <sup>d</sup></b>	<b>431</b>	<b>100%</b>	<b>429.1</b>	<b>100%</b>

<sup>a</sup> Included in other categories for the 1990 emissions inventory.

<sup>b</sup> High GWP gases are not specifically called out in the 1990 emissions inventory.

<sup>c</sup> Revised methodology under development (not reported for 2016).

<sup>d</sup> CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCES: California Air Resources Board, Staff Report – California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, (2007); California Air Resources Board, California Greenhouse Gas Inventory for 2000-2017– by Category as Defined in the 2008 Scoping Plan, 2019.

## (2) Existing Project Site Greenhouse Gas Emissions

The Project Site is located within the Hollywood Community Plan area of the City of Los Angeles and currently contains one single-family residence, one duplex with a detached garage and a studio apartment over the garage, and three, two-story apartment buildings and associated carports and paved surface parking areas, for a total of 44 dwelling units, all of which would be demolished and removed from the Project Site. Existing Project Site GHG emissions are associated with vehicle trips to and from the existing Project Site, on-site combustion of natural gas for heating and cooking, on-site combustion emissions from fireplaces and landscaping equipment, off-site combustion of fossil fuels for electricity, and off-site emissions from solid waste decomposition and wastewater treatment. For the purposes of this analysis, no existing operational greenhouse gas emissions are assumed from the existing site uses and the Project's greenhouse gas emissions are conservatively considered to be net new operational emissions.

### (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."<sup>89</sup> 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.<sup>90</sup>

According to the California EPA, 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.<sup>91</sup> Data regarding potential future climate change impacts are available from the California Natural Resources Agency (CNRA), which in 2009 published the *California Climate Adaptation Strategy*<sup>92</sup> as a response to the Governor's Executive Order S-13-2008. 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.<sup>93</sup> The website, known as Cal-Adapt, became operational in 2011.<sup>94</sup> The information provided by the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values 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

<sup>89</sup> Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, 2013, p. 5.

<sup>90</sup> 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.

<sup>91</sup> California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, (2006).

<sup>92</sup> California Natural Resources Agency, 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.

<sup>93</sup> California Natural Resources Agency, 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.

<sup>94</sup> The Cal-Adapt website address is: <http://cal-adapt.org>.

and economic factors. Below is a summary of some of the potential climate change effects and relevant Cal-Adapt data, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

(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 further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. 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.<sup>95</sup>

According to the Cal-Adapt website, the portion of Los Angeles, in which the Project Site is located, could result in an average temperature increase of approximately 4.7°F to 7.4°F for the 2070–2099 period, compared to the baseline 1961–1990 period (73.3°F), which would be an increase of approximately 6 to 10 percent.<sup>96</sup> 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 patterns, timing, and intensity will change.”<sup>97</sup> For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.<sup>98</sup> 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

<sup>95</sup> California Energy Commission, *Scenarios of Climate Change in California: An Overview*, February 2006, <https://pdfs.semanticscholar.org/f14e/1d9db8b4ca8398130b0c841c56c466555d00.pdf>. Accessed June 2019.

<sup>96</sup> Cal-Adapt, 2018. *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 July 2018.

<sup>97</sup> Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature*, July 2003, p. 5, [http://www.pacinst.org/reports/climate\\_change\\_and\\_california\\_water\\_resources.pdf](http://www.pacinst.org/reports/climate_change_and_california_water_resources.pdf). Accessed June 2019.

<sup>98</sup> Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature*, July 2003.



already full.<sup>99</sup> Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.<sup>100</sup>

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.” 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.<sup>101</sup> 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.”<sup>102</sup>

#### (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. Absent planning and preparation, a rise in sea levels could result in coastal flooding and erosion and could jeopardize California’s water supply, and 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 one half of the country’s fruits and vegetables. Higher CO<sub>2</sub> levels can stimulate plant production and increase

<sup>99</sup> Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature*, July 2003.

<sup>100</sup> Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature*, July 2003.

<sup>101</sup> California Department of Water Resources, *Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California’s Water Resources*, July 2006.

<sup>102</sup> Intergovernmental Panel on Climate Change, *Fifth Assessment Report, Summary for Policy Makers*, 2013, p. 20.

plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase without planning and preparations. Crop-yield could be threatened by a less reliable water supply. Also, 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.<sup>103</sup>

#### (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.<sup>104</sup> 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 U.S. coast. 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.<sup>105,106</sup>

## 3. Project Impacts

### a) Thresholds of Significance

Neither the City, nor CARB, nor SCAQMD has adopted either quantitative or qualitative project-level significance thresholds for GHG emissions that would be applicable to the Project, and the LA CEQA Thresholds Guide has not established thresholds for GHG emissions. Therefore, pursuant to State CEQA Guidelines Sections 15064.4, 15064.7 and 15064, the City has determined to adopt Project-specific thresholds and to employ a qualitative analysis to assess the significance of the Project's GHG emissions under those thresholds, for the reasons described below.

#### (1) Guidance from the State CEQA Guidelines

Until the passage of AB 32, CEQA documents generally did not evaluate a proposed project's GHG emissions or its impacts on global climate change. Rather, air pollutant analyses in CEQA documents were primarily focused on a proposed project's emission of criteria pollutants, or of those pollutants identified in the California and federal CAAs as being of most concern to the public and government agencies (e.g., toxic air contaminants). With the passage of AB 32 and SB 97, CEQA documents now contain detailed analyses of GHG emissions. However, the analyses of GHG emissions differ

<sup>103</sup> California Climate Change Center, *Our Changing Climate: Assessing the Risks to California*, 2006.

<sup>104</sup> National Research Council, *Advancing the Science of Climate Change*, 2010.

<sup>105</sup> Parmesan, C., 2004. *Ecological and Evolutionary Response to Recent Climate Change*.

<sup>106</sup> Parmesan, C and Galbraith, H, 2004. *Observed Ecological Impacts of Climate Change in North America*. Arlington, VA: Pew. Cent. Glob. Clim. Change.

from criteria pollutant emission analyses. Since the half-life of CO<sub>2</sub> is approximately 100 years, GHG emissions affect global climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds and impacts are based on daily emissions; and the determination of attainment or non-attainment is based on the daily exceedance of applicable ambient air quality standards (e.g., 1-hour and 8-hour exposures). Also, the scope of criteria pollutant impacts is local and regional, while the scope of GHG impacts is global.

In its January 2008 “CEQA and Climate Change” white paper, the California Air Pollution Control Officers Association (CAPCOA)<sup>107</sup> acknowledged that GHG emissions should be treated and analyzed as cumulative impacts,<sup>108</sup> and identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents, one of which was to make significance determinations “on a case-by-case basis in the context of the project at the time it comes forward” when no significance thresholds have been formally adopted by a lead agency.<sup>109</sup> That same year, the 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, which stated that “lead agencies may undertake a project-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. 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.”<sup>110</sup>

Pursuant to SB 97, the California Natural Resources Agency adopted the first set of amendments to the State *CEQA Guidelines* addressing the analysis and mitigation of GHG emissions on December 30, 2009, and the second set of amendments became effective December 28, 2018. The amendments add no additional substantive requirements, but merely assist lead agencies in complying with CEQA’s existing requirements to determine the significance of a project’s impacts on the environment.<sup>111</sup>

<sup>107</sup> CAPCOA is a non-profit association of the air pollution control professionals from all 35 local air quality agencies throughout California that was formed in 1976 to promote clean air and to provide a forum for sharing of knowledge, experience, and information among the air quality regulatory agencies around the State. The Association promotes unity and efficiency, and strives to encourage consistency in methods and practices of air pollution control. See <http://www.capcoa.org>. Accessed March 20, 2019.

<sup>108</sup> California Air Pollution Control Officer’s Association, *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, (2008), page 35 (“GHG impacts are exclusively cumulative impacts; there are no non- from a climate change perspective”). Available at <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>. Accessed March 12, 2019.

<sup>109</sup> California Air Pollution Control Officer’s Association, *CEQA and Climate Change* (2008), page 23. Available at <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>. Accessed July 2019.

<sup>110</sup> Governor’s Office of Planning and Research. *Technical Advisory - CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, 2008.

<sup>111</sup> California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, page 2.

The amendments address those issues where analysis of GHG emissions may differ in some respects from more traditional CEQA analysis, and clarify existing law that may apply both to an analysis of GHG emissions as well as more traditional CEQA analyses. However, neither CEQA nor the State *CEQA Guidelines*, including, without limitation, the amendments, either establish thresholds of significance or prescribe particular methodologies for performing impact analyses; rather, these decisions are “left to lead agency judgment and discretion, based upon factual data and guidance from” other public agencies, regulatory agencies or other experts,<sup>112</sup> such as CAPCOA, so long as their determinations are supported by substantial evidence (see State *CEQA Guidelines* § 15064.7(c)).

Consistent with existing CEQA practice, Section 15064.4, which was added by the 2009 amendments and amended effective December 2018, 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).

As part of the 2009 amendments, two new screening questions were added to Appendix G (Environmental Checklist) of the State *CEQA Guidelines* that are intended to assist lead agencies when assessing a project’s potential impacts with regard to GHG emissions, as follows:

- a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Concurrently with the adoption of the 2009 amendments, the California Natural Resources Agency’s 2009 Final Statement of Reasons for Regulatory Action for the Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97 (“Final Statement of Reasons”) provided that a project-level quantification of emissions should be undertaken where it would assist in determining the significance of emissions, even where there is no numeric threshold.<sup>113</sup> However, it also provided that in such cases, in order to determine the ultimate significance of project-level impacts, qualitative thresholds can be utilized based on a

<sup>112</sup> Governor’s Office of Planning and Research, CEQA and Climate Change Advisory Discussion Draft, December 2018, page 5, <http://opr.ca.gov/ceqa/technical-advisories.html>. Accessed February 2019.

<sup>113</sup> California Natural Resources Agency, Final Statement of Reasons for Regulatory Action for the Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97 (“Final Statement of Reasons”), December 2009, p. 20-21, [http://resources.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf). Accessed June 2019.

project's consistency with plans containing specific requirements that result in reductions of GHG emissions to a less than significant level, which can include applicable regional transportation plans.<sup>114</sup> The Final Statement of Reasons also clarified that the 2009 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 Section 15064(h)(3)).<sup>115</sup> The 2018 revisions to Section 15064.4(b) and (c) also make that focus clear.

Per State CEQA Guidelines Section 15064(h)(3) and the recent clarifying amendments to Section 15064.4(b)(3), a project's incremental contribution to a cumulative impact can be found not to be 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. 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.<sup>116</sup> 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."<sup>117</sup>

Thus, State CEQA Guidelines expressly allow a lead agency to make a finding of non-significance for GHG emissions if the project complies with a program and/or other regulatory schemes to reduce GHG emissions.<sup>118</sup>

<sup>114</sup> California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22-26.

<sup>115</sup> See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pages 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.

<sup>116</sup> California Code of Regulations (CCR), Title 14, Sections 15064(h)(3) and 15064.4(b)(3).

<sup>117</sup> California Code of Regulations (CCR), Title 14, Section 15064(h)(3).

<sup>118</sup> 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<sub>2</sub>e/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 Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).

## (2) Guidance from the Newhall Ranch Decision

The California Supreme Court recently considered the issue of determining the significance of GHG emissions under CEQA in its decision, *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (Newhall Ranch Decision).<sup>119</sup> In its Newhall Ranch Decision, the Court addressed a threshold to assess the significance of the GHG emissions of development projects that has commonly been used in CEQA documents. Under this threshold, the project's GHG emissions are first quantified, and then compared to the GHG emissions that would be generated from CARB's 2020 "No Action Taken" (NAT) scenario for the project to determine if the project would achieve the level of GHG reductions that will be needed statewide to reduce emissions to 1990 levels by 2020, as required by AB 32. The Court upheld the use of this NAT threshold as valid in theory, but concluded that the NAT threshold had been improperly applied to the Newhall project because no substantial evidence justified the use of the statewide emission target for the individual development project. In other words, the Court held that the percent below NAT target specified in the AB 32 Scoping Plan is intended as a measure of the GHG reductions required by the State as a whole, and cannot necessarily be applied to, and used as a threshold to assess the significance of, the impacts of a specific individual project in a specific location without substantial evidence showing that it can be.

The Court provided some guidance for future evaluations of 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's suggested "pathways to compliance" included:

1. Using a geographically specific GHG emission reduction plan (e.g., climate action plan) that outlines how the jurisdiction will reduce emissions consistent with State reduction targets, to provide the basis for streamlining project-level CEQA analysis, as described in Public Resources Code Section 15183.5.
2. Utilizing the Scoping Plan's NAT reduction goal, but providing substantial evidence to bridge the gap between the statewide goal and the project's emissions reductions;
3. Assessing consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities; as an example, the Court pointed out that projects consistent with an SB 375 Sustainable Communities Strategy (SCS) may need to re-evaluate GHG emissions from cars and light trucks.
4. Relying on existing numerical thresholds of significance for GHG emissions, such as those developed by an air district.

As discussed earlier, the City does not currently have an adopted GHG emission reduction plan. Thus, the Project could not meet the requirements of a CEQA-qualified

<sup>119</sup> 62 Cal.4th 204, modified on denial of rehearing Feb. 17, 2016.

Climate Action Plan as described in Public Resources Code Section 15183.5 (pathway #1, referenced above).

Regarding compliance pathway #2, the Court acknowledged that “a no-action-taken comparison based on the Scoping Plan’s methodology may be possible,” and that “a lead agency might be able to determine what level of reduction from no-action-taken a new land use development at the proposed location must achieve in order to comply with statewide goals.”

Compliance pathway #3 could be viable if it can be shown how regulatory programs or performance-based standards apply to a project’s emissions, but this type of analysis can be difficult, especially if some GHG-emitting elements of projects are covered by such standards and others are not. Transportation emissions are primarily regulated by the State, which sets vehicle tailpipe emission standards specific to the transportation sector. Local government retains control over the location and density of residential and commercial development and thus have influence over land use-related transportation emissions. Since local governments cannot impose vehicle tailpipe emission standards, only land use-related transportation emissions can be analyzed with respect to local government decisions.

Compliance path #4 is the most straightforward approach to analysis, since it relies on a “bright-line” project threshold, typically based on total annual GHG emission or based on a per-service population threshold. Service population is defined as the total count of residents plus jobs. Since the Project includes commercial uses, the majority of whose GHG emissions are created by the actions of guests and visitors, who are neither residents nor employees, the City has determined that the service population threshold is not appropriate or applicable.

The Court did not list the above-listed pathways in order of importance, or require that one or more be relied upon in an analysis of GHG emission impacts. Even so, this analysis assesses the potential impacts of the GHG emissions associated with the Project within the context of the Court’s suggested pathways to compliance.

### (3) Project GHG Thresholds

Based on all of the above considerations, the City has determined that the Project’s net GHG emissions would be cumulatively considerable and therefore contribute to a significant cumulative impact on the environment if the Project would:

***Threshold (a): Generate GHG emissions either directly or indirectly, that may have a significant impact on the environment.***

***Threshold (b): Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.***

The City has further determined to assess the significance of the Project’s net GHG emissions under these thresholds qualitatively by assessing the Project’s consistency

with applicable State, regional and local plans and regulations intended to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32, including CARB's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS; and the City's Green New Deal (Sustainable City pLAn 2019), all of which apply to the Project. Thus, in the absence of any adopted thresholds of general application, the Lead Agency has determined that the Project's net GHG emissions would not be cumulatively considerable and therefore would not have a significant cumulative effect on the environment if the Project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's 2017 Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, and the City's Green New Deal (Sustainable City pLAn 2019) and Green Building Code.

## **b) Methodology**

### **(1) Quantification of Greenhouse Gas Emissions**

The methodology used to quantify both the operational GHG emissions from the existing uses at the Project Site and the Project's construction and operational GHG emissions is summarized below. Additional detail regarding the quantification and supporting documentation is provided in the Greenhouse Gas Technical Appendix in Appendix G of this Draft EIR.

The categories of GHG emissions included in the Project's inventory of construction and operational emissions are the same as those that are included in the State's GHG inventory, and the methodologies employed to account for the Project's GHG inventory emissions are the same as those employed to account for the State's GHG inventory emissions, so that the Project's quantified emissions can properly be compared to the NAT project scenario described below in order to demonstrate the efficacy of the GHG reduction measures incorporated into the Project. The compilation of project-level GHG emission inventories in the context of statewide GHG emission inventories and reduction goals was also addressed by the California Supreme Court in the Newhall Ranch Decision.<sup>120</sup> As explained by the Association of Environmental Professionals (AEP) in its *Draft White Paper—Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans* (August 2017):

*“The court determined that the statewide reduction goals were an appropriate basis for a project-level significance criteria, provided that the lead agency examines the relationship of the project's emissions to the statewide emissions, and adjusts thresholds to take into account regional, local, or project-level considerations. The statewide reduction goals are based on a comparison of current and projected GHG emissions to a statewide 1990 GHG inventory. As such, in order to compare a project-level GHG inventory to a threshold derived from a statewide reduction target based on the statewide inventory, the GHG emissions included in the*

<sup>120</sup> 62 Cal.4th 204, pages 20-24, modified on denial of rehearing Feb. 17, 2016.



*project inventory must be accounted for in a similar manner to the way the state accounts for GHG emissions...Given the California Supreme Court's determination that it is appropriate under CEQA to compare a project's GHG emissions to a threshold related to the State reduction goals, as discussed above, there is no logical rationale for including in a project-level GHG inventory categories of GHG emissions that are not included in the State's GHG inventory, or to employ methodologies to account for a project's GHG emissions that are different from those employed to account for the State's GHG inventory."*<sup>121</sup>

Thus, consistent with the California Supreme Court's ruling, under CEQA, a project-level GHG emissions inventory need not include, for example, additional upstream embedded emissions or downstream emissions to maintain consistency with the statewide GHG emission inventory methodology. Conversely, 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. Therefore, in quantifying the Project's net construction and operational GHG emissions below, this analysis includes only those categories of GHG emissions that are included in the State's GHG inventory and employs the methodologies to account for the Project's GHG emissions that are the same as those employed to account for the State's GHG inventory.

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.<sup>122</sup> The General Reporting Protocol recommends separating GHG emissions into three categories that reflect different aspects of ownership or control over the emissions sources. These categories 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.
- **Scope 3:** Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).<sup>123</sup>

<sup>121</sup> Association of Environmental Professionals, Draft AEP White Paper - Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, 2017, p.1-7. Available at: [https://califaep.org/docs/Draft\\_AEP\\_White\\_Paper\\_Lifecycle\\_CEQA\\_CAPs\\_082017.pdf](https://califaep.org/docs/Draft_AEP_White_Paper_Lifecycle_CEQA_CAPs_082017.pdf). Accessed February 2020.

<sup>122</sup> The Climate Registry, General Reporting Protocol Version 2.1, (2016), <https://www.theclimateregistry.org/wp-content/uploads/2014/11/General-Reporting-Protocol-Version-2.1.pdf>. Accessed May 2019.

<sup>123</sup> Embodied energy includes energy required for water pumping and treatment for end-uses.

CARB recommends the consideration of indirect emissions in order to provide a more complete picture of the GHG footprint of a facility. 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.<sup>124</sup> Additionally, OPR 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.”<sup>125</sup> Therefore, both the direct and the indirect GHG emissions have been calculated for the Project.

A fundamental difficulty 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 proposed planning program or project because the planning effort or project may cause a only shift in the locale for some type of GHG emissions, rather than 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, a net global reduction, or no net global change in GHG emissions that would exist if the project were not implemented. Therefore, the analysis of the Project’s GHG emissions is particularly conservative in that it assumes all of the Project’s net GHG emissions are new additions to the atmosphere, and that no portion consists of already existing emissions that would simply be shifted from one location to another.

For the purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider the incremental (net) increases GHG emissions the Project would cause resulting from Project-related traffic, electricity, and natural gas as compared to the GHG emissions from those sources in the existing conditions. These emissions include Project construction activities, such as demolition, hauling, and construction worker trips, as well as operational emissions. This analysis also considers indirect Project-related incremental GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from the Project’s incremental GHG emissions are long-term rather than acute, those GHG emissions were calculated on an annual basis.

GHG emissions were estimated using the CalEEMod model, which 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 GHG emissions from a variety of land use projects and was developed in collaboration with the air districts of California.<sup>126</sup> Regional data (e.g., emission factors,

<sup>124</sup> California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), (2007).

<sup>125</sup> 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.

<sup>126</sup> California Emissions Estimator Model. California Emissions Estimator Model (CalEEMod) Website. Available at: <http://www.caleemod.com>. Accessed August 2019.

trip lengths, meteorology, source inventory, etc.) was provided for this model by the various California air districts to enable it 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.<sup>127</sup>

#### (a) Construction Emissions

Consistent with the assumptions made in the Air Quality analysis in Section IV.B, *Air Quality*, of this Draft EIR, construction emissions were forecasted by assuming a conservative scenario for construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors using CalEEMod. The output values used in this analysis were adjusted to be Project-specific based on anticipated equipment types and the expected construction schedule. These values were then applied to the same construction phasing assumptions that were used in the criteria pollutant analysis (see Section IV.B, *Air Quality*, in this Draft EIR) to generate the GHG emissions values for each construction year. 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.”<sup>128</sup> In accordance with the SCAQMD’s guidance, the GHG emissions from Project construction were amortized (i.e., averaged annually) over the lifetime of the Project. The SCAQMD defines the lifetime of a project as 30 years.<sup>129</sup> 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 used to project the Project’s construction GHG emissions and descriptions of the Project’s construction phasing and equipment list are available in the Greenhouse Gas Technical Appendix for the Project, which is provided in Appendix G of this Draft EIR and the in the Air Quality Technical Appendix, which is in Appendix C of this Draft EIR.

#### (b) Operational Emissions

CalEEMod was also used to estimate the Project’s operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. Building electricity and natural gas usage rates were adjusted to account for the Title 24 Building Energy Efficiency Standards (2016). GHG emissions associated with electricity usage are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHGs emitted. As with electricity, the GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors

<sup>127</sup> See: <http://www.caleemod.com>.

<sup>128</sup> South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008, p. 3-9.

<sup>129</sup> SCAQMD, *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*, 2008, p. 5.

for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHGs emitted.

Operational mobile source GHG emissions associated with the Project were calculated based on the Project's estimated VMT reported in the Project's VMT analysis in the CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California prepared by Gibson Transportation Consulting, Inc.,<sup>130</sup> and the CalEEMod and EMFAC2017 models. The VMT analysis is based on the City's VMT Calculator tool, which accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT Calculator include travel behavior zones, mixed-use development methodology, population and employment assumptions, and Transportation Demand Management (TDM) measures that would be provided as project design features or incorporated as mitigation measures. Further information regarding the methods used by the VMT Calculator to estimate daily trips and daily VMT is provided in Section IV.L, *Transportation*, of this Draft EIR. The Project's VMT analysis takes into account trip distance reductions due to the Project's characteristics, including internal capture from co-locating commercial and residential uses on the Project Site, residential and job densities, neighborhood and site walkability and connectivity, and proximity to public transit and job centers. Additional information based on the equations and methodologies prescribed are provided in the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction calculation formulas for transportation characteristics, as well as for physical and operational Project characteristics and Project Design Features was used to further evaluate the Project's VMT reductions.<sup>131</sup>

With regard to energy demand, GHG emissions would result from the consumption of fossil fuels to generate electricity and to provide heating and hot water. Future energy demand rates were estimated based on the specific square footage of the multi-family residential, hotel, and restaurant/retail land uses, as well as the predicted water supply needs of the Project. According to CARB staff, for projects that would voluntarily meet the requirements of the Jobs and Economic Improvement Through Environmental Leadership Act (the Act), such as the Project (see Chapter II, *Project Description* for more details) "[i]f an applicant would like to use an EF [emission factor] that represents the state's Renewable Portfolio Standard (RPS) law and growth in electricity demand, the EF of 595 [pounds] CO<sub>2</sub>/MWh may be used."<sup>132</sup> 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

<sup>130</sup> Gibson Transportation Consulting, Inc., CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California. Provided in Appendix L-1 of this Draft EIR.

<sup>131</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 155-331, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed June 2019.

<sup>132</sup> California Air Resources Board, *Statewide Emission Factors (EF) For Use With AB 900 Projects*, January 2017. This document is provided at the end of Appendix F.1 of this Draft EIR.

impact assessments.”<sup>133</sup> Therefore, consistent with the CARB staff recommendation, a CO<sub>2</sub> intensity factor of 595 pounds of CO<sub>2</sub> per MWh was used for electricity emissions for years 2020 through 2023. Future year CO<sub>2</sub> intensity factors were scaled proportionately based on the future year renewable energy targets of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Emission factors for CH<sub>4</sub> and N<sub>2</sub>O were obtained from CalEEMod.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the City’s waste diversion rate of 76 percent for municipal solid waste,<sup>134</sup> and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH<sub>4</sub>, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment. Refer to Section IV.N.1, *Utilities and Service Systems –Water, Wastewater and Solid Waste*, of this Draft EIR for estimated solid waste disposal rates from the Project.

GHG emissions from water and wastewater result from the energy required to supply and distribute the water and treat the wastewater. Emissions were calculated using the CalEEMod and are based on the water usage rate provided in Section IV.N.1 of this Draft EIR.

Other sources of GHG emissions from operation of the Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod software uses landscaping equipment GHG emission factors from the CARB OFFROAD model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment* (6/13/2003).<sup>135</sup> The Project would not include fireplaces in the residential buildings; therefore, fireplace emissions were not included in the GHG analysis for the residential buildings.

Stationary sources would include an on-site emergency generator rated at an estimated 250 kilowatts (350 horsepower). The emergency generator would result in emissions during maintenance and testing operations and its emissions were estimated separately, outside of the CalEEMod software. 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.

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

<sup>133</sup> California Air Resources Board, Statewide Emission Factors (EF) For Use With AB 900 Projects, January 2017. This document is provided at the end of Appendix F.1 of this Draft EIR.

<sup>134</sup> City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, 2013.

<sup>135</sup> CARB, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, June 13, 2003, [http://www.arb.ca.gov/msei/2001\\_residential\\_lawn\\_and\\_garden\\_changes\\_in\\_eqpt\\_pop\\_and\\_act.pdf](http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf). Accessed June 2019.

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 will be incorporated consistent with the minimum requirements. Additionally, this Project is committed to achieving the USGBC Leadership in Energy and Environmental Design (LEED) Silver Certification or equivalent rating.

(c) *Existing Site Emissions*

As discussed in above subsection IV.F.2.b)(2), *Existing Project Site Greenhouse Gas Emissions*, for the purposes of this analysis, no existing operational greenhouse gas emissions are assumed from the existing site uses and the Project's greenhouse gas emissions are conservatively considered to be net new operational emissions.

(d) *Comparison to NAT Scenario*

As discussed previously, State, regional, and local GHG reduction plans and policies, such as CARB's Climate Change Scoping Plan, SB 375, AB 900, SCAG's 2016-2040 RTP/SCS and City of Los Angeles plans (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 and SB 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 approach mirrors the concepts used in CARB's Climate Change Scoping Plan, which demonstrates GHG reductions compared to a NAT 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 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 that existed during the 2009 to 2011 period and the 2008 Title 24 Building Energy Efficiency Standards. Furthermore, the specific Project Site characteristics and Project Design Features (PDF) such as PDF-GHG-1, PDF-GHG-2, and PDF-GHG-3 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 from the NAT scenario do not incorporate a VMT reduction of approximately 29 percent (based on the calculation protocol from the CAPCOA guidance for land use characteristics LUT-1 through LUT-5 and SDT-1) as described below under subsection IV.F.3.d)(1)(a)(i), *Project Characteristics*.

## (2) Project Consistency with Applicable Plans and Policies

The City has determined to use a qualitative approach to evaluating the significance of the Project's GHG emission impacts under the thresholds identified above, by assessing the Project's consistency with applicable GHG reduction strategies and local actions approved or adopted by CARB, SCAG, and the City. This approach is one that CEQA grants the lead agency the discretion to adopt.

The State CEQA Guidelines amendments that went into effect on March 18, 2010 Section 15064(h)(3) and 15064.4(b)(3) encourage lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses.<sup>136</sup> In addition, with the adoption of the 2010 amendments, it has been clear that CEQA grants lead agencies the discretion to determine whether to use a quantitative or a qualitative methodology to determine the significance of a project's GHG emissions.<sup>137</sup> This discretion has been recognized most recently in the amendments to State CEQA Guidelines Section 15064.4 and in OPR's *CEQA and Climate Change Advisory Discussion Draft*, which states, "a lead agency may take either a quantitative or qualitative approach to the environmental analysis."<sup>138</sup> As discussed previously, the City has established goals and actions to reduce the emission of GHGs from both public and private activities within its jurisdiction in its Green New Deal (Sustainable City pLAn 2019), which is approved by the City and applicable to the Project. While the City does not have a programmatic mitigation plan that the Project can tier from, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the State CEQA Guidelines,<sup>139</sup> the City has adopted the Green New Deal (Sustainable City pLAn 2019) and LA Green Building Code, which

<sup>136</sup> California Natural Resources Agency, State CEQA Guidelines, 2009 SB 97 Rulemaking, Adopted Text of the State CEQA Guidelines Amendments, (Adopted December 30, 2009, Effective March 18, 2010), p. 6 and 31, [http://files.resources.ca.gov/ceqa/docs/Adopted\\_and\\_Transmitted\\_Text\\_of\\_SB97\\_CEQA\\_Guidelines\\_Amendments.pdf](http://files.resources.ca.gov/ceqa/docs/Adopted_and_Transmitted_Text_of_SB97_CEQA_Guidelines_Amendments.pdf). Accessed May 2019.

<sup>137</sup> State CEQA Guidelines Section 15064.4(a).

<sup>138</sup> Governor's Office of Planning and Research, CEQA and Climate Change Advisory Discussion Draft, June 2019, p. 8, <http://opr.ca.gov/ceqa/technical-advisories.html>. Accessed February 2019.

<sup>139</sup> California Natural Resources Agency, State CEQA Guidelines, 2009 SB 97 Rulemaking, Adopted Text of the State CEQA Guidelines Amendments, (Adopted December 30, 2009, p. 6 and 31, Effective March 18, 2010), [http://files.resources.ca.gov/ceqa/docs/Adopted\\_and\\_Transmitted\\_Text\\_of\\_SB97\\_CEQA\\_Guidelines\\_Amendments.pdf](http://files.resources.ca.gov/ceqa/docs/Adopted_and_Transmitted_Text_of_SB97_CEQA_Guidelines_Amendments.pdf). Accessed May 2019.

encourage or require applicable projects such as the Project to implement energy efficiency measures and the City has determined to assess the significance of the Project's net GHG emissions with respect to these plans. Furthermore, the City has determined to assess the significance of the Project's net GHG emissions by assessing the Project's consistency with applicable State and regional plans and regulations intended to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32, including CARB's 2017 Climate Change Scoping Plan and SCAG's 2016 RTP/SCS, both of which are the currently approved versions of these plans. If a project is designed in accordance with these policies and regulations, it would result in a less than significant impact, because it would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

### c) Project Design Features

The following Project Design Features (PDFs) are incorporated into the Project:

- PDF-GHG-1: GHG Emission Offsets:** The Project will provide or obtain GHG emission offsets as required in the Project's Environmental Leadership Development Project certification and related documentation pursuant to the *Jobs and Economic Improvement Through Environmental Leadership Act*.
- PDF-GHG-2:** At least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20-percent requirement results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.
- PDF-GHG-3:** At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.



In addition, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, Project Design Features will include green building features, including, but not limited to, the following:

- The Project will be designed to optimize energy performance and reduce building energy cost by a minimum of 5 percent for new construction compared to the Title 24 Building Energy Efficiency Standards (2016).
- The Project will be designed to optimize energy performance and reduce building energy cost by installing energy efficient appliances that meet the USEPA ENERGY STAR rating standards or equivalent.
- The Project will provide a minimum of 30 kilowatts of photovoltaic panels on the project site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the project site.
- The Project will reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption as required in LAMC Section 99.04.304. Reductions would be achieved through drought-tolerant/California native plant species selection, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), and/or smart irrigation systems (e.g., weather-based controls).
- The Project will reduce indoor potable water use by a minimum of 20 percent compared to baseline water consumption as defined in LAMC Section 99.04.303 by installing water fixtures that exceed applicable standards.
- The Project would not include fireplaces in the residential buildings.

## **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?***

***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 described above, a project's compliance with a GHG emissions reduction plan renders the project's GHG impacts less than significant under Threshold b), pursuant to State *CEQA Guideline* Section 15064(h)(3), and a determination that it would not conflict with applicable plans, policies or regulations adopted to reduce GHG emissions renders a project's GHG emissions less than significant under Threshold a). The analyses below demonstrate that the Project is consistent with, and would not conflict with, the applicable GHG emission reduction policies and measures included within the 2017 Scoping Plan,

2016-2040 RTP/SCS, and the City's Green New Deal (Sustainable City pLAn 2019), and Green Building Code. Therefore, the Project's GHG emissions would be less than significant.

(i) *Project Characteristics*

As discussed above, State, regional and local agencies have passed legislation and adopted regulations and plans encouraging future development with particular land use characteristics in particular locations in order to reduce the GHG emissions from that development. Through SB 375, the State has required that regional land use strategies be tied to regional transportation plans in order to achieve specified regional GHG reduction targets set by CARB. To fulfill its SB 375-mandated regional GHG reduction targets, SCAG adopted its 2012-2030 RTP/SCS and 2016-2040 RTP/SCS, both of which have as one of their primary themes the integration of land use and transportation planning in order to reduce the region's per capita GHG emissions.<sup>140</sup> SCAG's vision of that integration is to encourage future development to grow in more compact communities in existing urban areas, providing neighborhoods with efficient and plentiful public transit, abundant and safe opportunities to walk, bike and pursue other forms of active transportation, and preserving more of the region's remaining natural lands for people to enjoy.<sup>141</sup>

As discussed above, to implement SCAG's vision, the 2016-2040 RTP/SCS has targeted HQTAs for the most intense future development.<sup>142</sup> The City has also adopted plans to coordinate land use and transportation, in order to reduce GHG emissions, as discussed above, and in accordance with SB 743, the City has identified Transit Priority Areas (TPAs) within its jurisdiction, generally defined as areas located within one-half mile of a rail transit station or where frequent-serving bus routes intersect,<sup>143</sup> where certain proposed development projects may be exempt from CEQA review.<sup>144</sup>

<sup>140</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 13, <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed June 2019.

<sup>141</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 2, <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed June 2019.

<sup>142</sup> Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, 2012, p. 130-142 <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf>; Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p.75-78 <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed June 2019.

<sup>143</sup> Office of Mayor Eric Garcetti, Report on Specific Tasks in Anticipation of the State's Adoption of the Amended CEQA Guidelines Implementing SB 743, CF 14-1169, 2016, [http://clkrep.lacity.org/online/docs/2014/14-1169\\_misc\\_1-22-16.pdf](http://clkrep.lacity.org/online/docs/2014/14-1169_misc_1-22-16.pdf). Accessed June 2019.

<sup>144</sup> Through SB 743, the State is also encouraging growth surrounding existing transit, by seeking to facilitate transit-oriented projects in existing urbanized areas. Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 13 and 78, <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed June 2019.

Concurrently with the development of State law, CAPCOA identified specific locational and land use characteristics of development projects that it determined would mitigate project-level GHG emissions.<sup>145</sup> In its 2008 publication, *CEQA and Climate Change*, CAPCOA reported that a survey of existing and potential GHG mitigation measures revealed that many relied on shifting the focus of development away from “sprawl” to more compact development to achieve the reductions, and on enhancing the use of alternative modes of transportation.<sup>146</sup> In 2010, CAPCOA identified project-level strategies and mitigation measures that can be used to reduce a project’s GHG emissions, and supported its conclusions that these strategies and mitigation measures do effectively reduce GHG emissions by quantifying the reductions achieved in its publication *Quantifying Greenhouse Gas Mitigation Measures* (August 2010) (CAPCOA Guidance Document).<sup>147</sup>

The Project proposes a mixed use development on an infill site within an existing urbanized area that would concentrate its new residential and neighborhood-serving commercial retail and restaurant uses within an HQTAs identified by SCAG in its 2016-2040 RTP/SCS. In addition, the Project’s mixed-use development would provide increased density at a Project Site that is also identified by the City as being within a Transit Priority Area. Specifically, the Project Site is located within one-quarter mile of public transit, including the Metro Red Line Hollywood/Vine Station, and within one-quarter mile of many Metro bus routes (e.g., 180/181, 210, 212, 217, 222, 2/302, 780) and LADOT Dash Beachwood and Hollywood lines (see Section IV.L, *Transportation*, of this Draft EIR for additional information regarding the Project’s access to transit). The Project would also provide bicycle storage areas for Project residents, visitors, and guests, and features that would enhance the pedestrian experience.

As shown below in the consistency analyses, due to the Project’s characteristics - its design and its development at the Project Site, the Project would be consistent with and would not conflict with the State, regional and local laws, regulations, plans and policies passed and adopted to reduce GHG emissions from new development, as the Project would reduce the need for residents and employees to rely on single-passenger vehicles and would provide residents, visitors, and guests with access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions.

<sup>145</sup> CAPCOA, fulfilling the role traditionally of air districts in providing guidance to local lead agencies on evaluating and addressing air pollution impacts from projects subject to CEQA, recognized the need for a common platform of information and tools to support lead agencies dealing with GHG impacts under CEQA. California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

<sup>146</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change*, page 1, 2008, <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>. Accessed June 2019.

<sup>147</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

As discussed above in subsection IV.F.3.b)(1)(b), *Operational Emissions*, the CAPCOA guidance document was utilized in this analysis for further evaluating reductions from physical and operational Project characteristics and Project Design Features and provides support for this Draft EIR's ultimate conclusion that, based on the consistency of the Project's characteristics with the State, regional and local law, regulations, plans and policies, as assessed below, the Project would result in a less than significant GHG emission impact.<sup>148</sup> The Project includes particular land use characteristics, listed below, that have been shown in the CAPCOA Guidance Document to reduce vehicle trips to and from the Project Site as compared to the statewide and South Coast Air Basin averages.<sup>149,150</sup>

- **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 guidance strategy LUT-1.<sup>151</sup> 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 an urban/compact infill<sup>152</sup> location and is a mixed-use development; therefore, this characteristic applies to the Project. The Project would increase the Project Site density to approximately 181 dwelling units per acre (210 dwelling units on 1.16 acres) and 85 jobs per acre (99 employees on 1.16 acres) (refer to Section IV.J, *Population, Housing, and Employment*, of this Draft EIR).

<sup>148</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 9.

<sup>149</sup> Further support for more reductions is provided in the VMT analysis of the CEQA Thresholds Analysis. Gibson Transportation Consulting, Inc., CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California. Provided in Appendix L-1 of this Draft EIR.

<sup>150</sup> Detailed VMT reduction calculations using the CAPCOA methodologies are provided in Appendix G of this Draft EIR. Based on the results of these calculations, the Project would achieve an approximately 29-percent reduction in VMT from the land use characteristics discussed below as compared to the statewide and South Coast Air Basin averages.

<sup>151</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 155-158.

<sup>152</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, (2010) 59-60. 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). The Project 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 Hollywood Community Plan Draft EIR, Section 4.2, Population, Housing, and Employment, Table 4.2-2 shows that existing 2005 conditions and various projections to 2030 have a jobs/housing ratio ranging from 0.97 to 1.13). While the Project meets some of the characteristics for the urban setting and some of the characteristics for the compact infill setting, 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 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.

- 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 area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies.<sup>153</sup> This characteristic corresponds to CAPCOA guidance strategy LUT-2.<sup>154</sup> 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 an urban/compact infill location within an identified Transit Priority Area and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the geographic location of a project within the region. The Project Site represents an urban/compact infill location within the Hollywood area of Los Angeles. The Project Site is served by existing public transportation located within a quarter-mile. The Project Site is within an active urban center with many existing off-site commercial, entertainment, and residential buildings. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide and South Coast Air Basin average and would result in corresponding reductions in transportation-related emissions.
- 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 could be accommodated by alternative modes of transportation, such as public transit, bicycles, and walking. This characteristic corresponds to CAPCOA guidance strategy LUT-3.<sup>155</sup> According to CAPCOA, the reduction in VMT from this characteristics applies to urban and suburban settings for mixed-use projects. The Project is located in an urban/compact infill location within an identified Transit Priority Area and is mixed-use; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, 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 commercial and residential land uses in proximity to

<sup>153</sup> CalEEMod, by default, assumes that trip distances in the South Coast Air Basin are slightly longer than the Statewide average. This is due to the fact that commute patterns in the South Coast Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in the Southern California Association of Governments 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The 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, 2016). The 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 South Coast Air Basin are analogous to the statewide average given that the default model trip distances in the South Coast 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 South Coast Air Basin average.

<sup>154</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 159-161.

<sup>155</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 162-166.

existing off-site commercial, entertainment, and residential uses. The Project would include on-site retail and residential land uses and would be located within a quarter-mile of off-site commercial, entertainment, and residential 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-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.

- Increased Destination Accessibility:** This characteristic corresponds to CAPCOA guidance strategy LUT-4.<sup>156</sup> 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 an urban/compact infill location within an identified Transit Priority Area and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, 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, studio/production, office, entertainment, movie theater, and residential uses. The Project Site is also located near other job centers in the region, which include Downtown Los Angeles (easily accessible via the Metro Red Line station located within a quarter mile of the Project Site), Beverly Hills, Century City, Westwood, and the Hollywood area itself. Ready access to multiple destinations in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide and South Coast Air Basin average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions.
- 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 guidance strategy LUT-5.<sup>157</sup> 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 an urban/compact infill location within an identified Transit Priority Area and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to transit stations near the project. The Project would be located within a quarter-mile of public transportation, including existing Metro bus routes (e.g., 180/181, 217, 2/302, Dash Beachwood, Dash Hollywood) and the Metro Red Line Hollywood/Vine Station, which provides convenient access to Downtown Los Angeles and connections to Koreatown, Hollywood and North Hollywood. The Project would provide access to on-site uses from existing pedestrian pathways. The Project would also provide parking for approximately 258 bicycles on-site to encourage utilization of alternative modes of transportation. The increased transit accessibility would reduce vehicle trips and VMT versus the statewide and

<sup>156</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 167-170.

<sup>157</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 171-175.

South Coast Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

- Provide Pedestrian Network Improvements:** Providing pedestrian access that minimizes barriers and links the Project Site to existing or planned external streets encourages people to walk instead of drive. This characteristic corresponds to CAPCOA guidance strategy SDT-1.<sup>158</sup> 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 an urban/compact infill location within an identified Transit Priority Area and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, 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*, the Project would improve the street-level pedestrian environment and connectivity to the surrounding Hollywood area, with pedestrian access to commercial/restaurant uses provided from various at-grade sidewalks and steps equipped with café tables, parkway planters, and bike parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. In summary, the Project would provide an internal pedestrian network for Project visitors and residents that links to the existing off-site pedestrian network, including existing off-site sidewalks, and would, therefore, result in a small reduction in VMT and associated transportation-related emissions.

Additional support for the Draft EIR's conclusions that the Project's land use characteristics result in reduced vehicle trips and VMT is provided by area-specific data in the *Health Atlas for the City of Los Angeles* (Health Atlas), published by the City in June 2013.<sup>159</sup> Although the Health Atlas is not a plan specifically developed to reduce GHG emissions, but is primarily focused on factors that affect the health behaviors and health status of residents and workers, much of the data is relevant to land use GHG emissions as those emissions reflect similar issues regarding land use patterns, urban design, and transportation systems. As discussed below, data collected by the City in support of its *Health Atlas for the City of Los Angeles* demonstrate that developing the Project at the Project Site would substantially reduce mobile source GHG emissions relative to the Citywide and statewide averages. The Health Atlas includes a number of findings related to land use mix and diversity, employment density, walkability, access to public transit, and other land use transportation findings organized by Community Plan area. Since the Project Site is located in the Hollywood Community Plan area, a summary and analysis of the Health Atlas findings relative to the Hollywood Community Plan area are provided below.

<sup>158</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 186-189.

<sup>159</sup> City of Los Angeles, *Health Atlas for the City of Los Angeles*, 2013, Available at: <https://wattscommunitystudio.files.wordpress.com/2013/06/healthatlas.pdf>. Accessed June 2019.

- Land Use Mix and Land Use Diversity:** The Health Atlas evaluates land use mix based on a Dissimilarity Index for each census tract and each Community Plan area.<sup>160</sup> The Dissimilarity Index quantifies the area's land use diversity using six different land uses: single family residential, multifamily residential, retail, entertainment, office, and institutional or community serving.<sup>161</sup> Values were normalized on a scale of 0 to 1, with 1 signifying increased land use diversity as it represents an even distribution of the six uses within an area.<sup>162</sup> The Hollywood Community Plan area scored the highest Dissimilarity Index value out of the 35 Community Plan areas, which indicates that the area has the highest number of different types of land uses available in the Community Plan area, which potentially increases the area's walkability by offering access to a high number of destinations by non-motorized trips.<sup>163</sup> These conclusions are substantiated by the CAPCOA Guidance, *Quantifying Greenhouse Gas Mitigation Measures*, in CAPCOA measure LUT-3 (Increase Diversity of Urban and Suburban Developments [Mixed Use]), which states that "different types of land uses near one another can decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transport."<sup>164,165</sup> The high scores for walkability and number of destinations accessible by non-motorized trips within the Hollywood Community Plan area support the expectation that projects located in the area would achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide average.<sup>166</sup> It also follows that projects located in the area would reasonably be expected to achieve substantial reductions in VMT and associated mobile source emissions relative to the statewide average since Los Angeles is more urbanized and has a higher mix and diversity of land uses than the State as a whole.
- Employment Density:** The Health Atlas recognizes that "[h]igher levels of employment density, particularly retail job densities, are associated with more walking trips" as they "allow for more frequent and comprehensive transit service."<sup>167</sup> In turn, "[d]enser employment districts which are rich in transit service typically result in more walking and transit use ... and makes jobs more accessible to all residents."<sup>168</sup> The Health Atlas evaluates employment density as the number of jobs per square mile.<sup>169</sup> The Hollywood Community Plan area has the 9<sup>th</sup> highest employment density of the 35 Community Plan areas in the City (greater than the 10<sup>th</sup> highest Boyle Heights Community Plan area but less than the 8<sup>th</sup> highest Harbor Gateway Community Plan area) with approximately 4,200 jobs per square mile. The Citywide average employee

<sup>160</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>161</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>162</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>163</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>164</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>165</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010, p. 162, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

<sup>166</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>167</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 90.

<sup>168</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 90.

<sup>169</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 90.



density is approximately 1,185 jobs per square mile.<sup>170</sup> The data indicates that the Hollywood Community Plan area has a high potential for walkability and for making use of frequent and comprehensive transit services, such as the Metro Red Line and connecting bus lines. These conclusions are substantiated by the CAPCOA Guidance measure LUT-1 (Increase Density), which states that “[i]ncreased densities affect the distance people travel and provide greater options for the mode of travel they choose.”<sup>171</sup> Measure LUT-1 also states that increased densities “provides a foundation for implementation of many other strategies which would benefit from increased densities” such as “enhanced transit service.”<sup>172</sup> The Health Atlas findings support the goals and benefits of the SCAG 2016 RTP/SCS, which seek improved mobility and access and the implementation of smart land use strategies that encourage walking, biking, and transit use to reduce vehicular demand and associated pollutant emissions. The high employment density of the Hollywood Community Plan area supports the expectation that projects located in the area would have high levels of walkability and high potential for transit usage. As a result, the Project would reasonably be expected to achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide and statewide average.

- **Walkability:** The Health Atlas provides a direct quantitative analysis of the walkability of each Community Plan area using a Walkability Index based on four components: land use mix, residential density, retail density, and intersection density.<sup>173</sup> Higher scores represent more walkable areas. The Hollywood Community Plan area has the 9<sup>th</sup> highest Walkability Index of the 35 Community Plan areas in the City.<sup>174</sup> The CAPCOA Guidance measure LUT-9 (Improve Design of Development), which indicates that design elements that enhance walkability and connectivity, such as intersection density, reduce VMT and associated GHG emissions, substantiates these conclusions.<sup>175</sup> The high Walkability Index of the Hollywood Community Plan area supports the expectation that projects located in the area would be located in a highly walkable environment that would encourage pedestrian activity. As a result, the Project would reasonably be expected to achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide and statewide average.
- **Workers Commuting by Walking, Biking, and Public Transportation:** The Health Atlas also indicates that the Hollywood Community Plan area has the 9<sup>th</sup> highest percentage of workers who commute to work by walking, biking, and public transportation, at about 22 percent for the area as a whole based on 2010 data.<sup>176</sup> The statewide percentage of workers who commute to work by walking, biking, and

<sup>170</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 102.

<sup>171</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p.155.

<sup>172</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p.155.

<sup>173</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>174</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p. 86.

<sup>175</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p. 182, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

<sup>176</sup> City of Los Angeles, Health Atlas for the City of Los Angeles, 2013, p.112.

public transportation is approximately 9 percent based on census data for the 2010 to 2014 period.<sup>177</sup> As discussed previously, the Hollywood Community Plan area is a highly walkable area and the area is also well served by frequent and comprehensive transit including the Metro Red Line, which provides convenient access to Downtown Los Angeles, and multiple bus lines. Thus, the data indicates that the Hollywood Community Plan area substantially exceeds the statewide average for the percentage of workers who commute to work by walking, biking, and public T. The Health Atlas findings are substantiated by the CAPCOA Guidance measures LUT-1, LUT-3, and LUT-9, as discussed previously, and also by LUT-5 (Increase Transit Accessibility), which indicates that “high density near transit will facilitate the use of transit by people.”<sup>178</sup> The high level of workers who commute to work by walking, biking, and public transportation in the Hollywood Community Plan area supports the reasonable expectation that projects located in the area would be accessible to, and that their occupants would utilize, alternative forms of transportation. As a result, the Project would reasonably be expected to achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide and statewide average.

The data discussed above from the City’s Health Atlas, together with the numerical GHG emissions calculations below, provide additional supporting evidence for the conclusion that the Project’s design and location are consistent with the regional goals to reduce GHG emissions from transportation, particularly as reflected in the SCAG 2016-2040 RTP/SCS. 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 achieve a reduction in VMT greater than the Hollywood Community Plan area average and better than the City and statewide averages. As such, the Project would be consistent with, and would not conflict with, the 2016-2040 RTP/SCS to reduce VMT and associated GHG emissions.

The analyses below demonstrate that, as a result of its land use characteristics discussed above, the Project would be consistent with and would not conflict with the 2017 Scoping Plan, SCAG’s 2016-2040 RTP/SCS, the City’s Green New Deal (Sustainable City Plan 2019), and Green Building Code by intensifying the development on an infill urban site with a mixed-use development that would promote sustainability, support and encourage pedestrian activity in the Hollywood area and contribute to a land use pattern that would address housing needs but, at the same time, promote transit use, reduce vehicle trips and resulting air pollution and GHG emissions by locating residential uses within an area that has existing public transit (with access to existing regional bus and rail service), and employment opportunities, restaurants and entertainment, all within walking distance.

<sup>177</sup> U.S. Census Bureau, American FactFinder, Data Set B08301 (Means of Transportation to Work, California, 2010-2014).

<sup>178</sup> California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010, p.171.

(ii) *2017 Climate Change Scoping Plan*

As discussed above, CARB's 2017 Climate Change Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels, which build on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, 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 figure takes into account 2020 GHG reduction policies and programs.<sup>179</sup> While the GHG reductions strategies in the 2017 Climate Change Scoping Plan are not directed to and do not establish specific regulatory requirements for individual land use development projects, most impose general requirements on GHG emission sectors that would ultimately affect the design of new development, such as Statewide building energy standards, or the GHG emissions from such development, such as those associated with the transportation sector.

**Table IV.F-3, *Consistency with Applicable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies***, contains the list of the GHG-reducing strategies that apply to the Project, as explained above in subsection IV.F.2.a)(2)(d)(ii), *2017 Climate Change Scoping Plan*. The analysis assesses whether the Project conflicts with, or is consistent with, these laws and strategies addressed in the State's Climate Change Scoping Plan to reduce GHG emissions. The 2017 Climate Change Scoping Plan creates a framework to reduce GHG emissions that relies on a broad array of GHG reduction measures, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As discussed below, the Project would incorporate PDFs and characteristics that reduce energy, conserve water, reduce waste generation, and vehicle travel consistent with these statewide strategies and regulations. As a result, the Project would be consistent with and would not conflict with applicable 2017 Climate Change Scoping Plan implementing strategies and regulations to reduce GHG emissions.

As demonstrated by Table IV.F-3, the Project is consistent with the approach outlined in CARB's 2017 Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities for achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's 2017 Climate Change Scoping Plan, the Project would incorporate "green building" features as a framework for achieving its GHG emissions reductions, as its new buildings would be designed to achieve the standards of the Silver Rating under LEED.

<sup>179</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017. [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed June 2019.

**TABLE IV.F-3**  
**CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN**  
**GREENHOUSE GAS REDUCTION STRATEGIES**

Action and Strategies	Responsible Party	Would the Project Conflict?
<b>Energy</b>		
<b>California Renewables Portfolio Standard.</b> Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of energy supply from certified renewable sources by 2016.	LADWP	<b>No Conflict.</b> The Project would use electricity provided by LADWP, which is required to obtain 33 percent renewable power by 2020 and has committed to achieving 50 percent renewables by 2025. <sup>180</sup>
<b>SB 350.</b> The Clean Energy and Pollution Reduction Act of 2015 (SB 350) increases the standards of the California RPS program by requiring the amount of electricity sold to retail customers per year increases the proportion of electricity from renewable sources to 50 percent by 2030. It also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	State Energy Resources Conservation and Development Commission and LADWP	<b>No Conflict.</b> The Project would use electricity provided by LADWP, which is required to obtain 33 percent renewable power by 2020 and 50 percent by 2030. LADWP has committed to achieving 50 percent renewables by 2025, which is 5 years before the regulatory mandate. The Project would include a minimum of 30 kilowatts of photovoltaic panels on the Project Site. The Project would incorporate energy efficient measures as part of meeting the LEED Silver Certification level or equivalent green building standard. The Project would also commit to reducing building energy by a minimum of 5 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 PDF-AQ-1.

<sup>180</sup> Los Angeles Department of Water and Power, 2015 Power Integrated Resource Plan, page ES-14. <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M419.pdf>

Action and Strategies	Responsible Party	Would the Project Conflict?
<b>CCR, Title 24.</b> Energy Efficiency Standards for Residential and Nonresidential Buildings	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet or exceed the applicable requirements of the Los Angeles Green Building Code and the 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 Silver Certification level or equivalent green building standard. The Project would also commit to reducing building energy by a minimum of 5 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 PDF-AQ-1.
<b>Assembly Bill 1109.</b> The Lighting Efficiency and Toxics Reduction Act (AB1109) prohibits manufacturing specified general purpose lights that contain levels of hazardous substances prohibited by the European Union. AB 1109 also requires a reduction in average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting by 2018.	State/Manufacturers	<b>No Conflict.</b> According to the CEC, energy savings from AB 1109 are achieved through codes and standards. Energy savings from AB 1109 are calculated as part of codes and standards savings. <sup>181</sup> As discussed above, the Project would meet or exceed the applicable requirements of the CALGreen Code and the Los Angeles Green Building Code or applicable version at the time of building permit issuance and would also incorporate energy efficiency measures, including the use of lighting controls with occupancy sensors to take advantage of available natural light as outlined in PDF-AQ-1.
<b>California Green Building Standards Code Requirements.</b> 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	<b>No Conflict.</b> The Project would install HVAC systems that would meet or exceed the energy applicable standards in the ASHRAE standards, Appendix G, and the 2016 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	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, as well as the requirements for the LEED Silver Certification level or equivalent green building standard.

<sup>181</sup> California Energy Commission, 2013 California Energy Efficiency Potential and Goals Study, Appendix Volume I, February 5, 2014. Accessed June 2019.

Action and Strategies	Responsible Party	Would the Project Conflict?
Air filtration systems are required to meet a minimum efficiency reporting value (MERV) of 6 (residential) or 8 (non-residential), as applicable, or higher.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet or exceed the requirement of MERV 6 (residential) or 8 (non-residential), as applicable, as part of its compliance with the City's requirements, which requires MERV 13, and the CALGreen Code.
Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with City and State requirements 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	<b>No Conflict.</b> 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 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles.
Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would be consistent with the goal of this strategy by meeting City bicycle parking requirements. The Project would provide 223 long-term and 34 short-term bicycle parking spaces, which would be approximately 9 percent of the Project's gross daily vehicle trips (refer to Section IV.L, <i>Transportation</i> , of this Draft EIR).
Stormwater Pollution Prevention Plan (SWPPP) required.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code (See Section IV.G, <i>Hydrology and Water Quality</i> , 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	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standard.
All irrigation controllers must be installed with weather sensing or soil moisture sensors.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standards.
Wastewater generation shall be reduced by 20 percent compared to current California Building Standards.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standards.

Action and Strategies	Responsible Party	Would the Project Conflict?
Requires a minimum of 65 percent recycle or reuse of nonhazardous construction and demolition debris.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standards.
Requires documentation of types of waste recycled, diverted or reused.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standards.
Requires use of low VOC coatings consistent with SCAQMD Rule 1168.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements by only purchasing and using coatings that meet the VOC requirements of SCAQMD Rule 1168.
SB 1368, CCR Title 20, Cap and Trade Program		The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's 3,417,600 million kWh of electricity usage per year presented in Section IV.D, <i>Energy</i> , of this Draft EIR, would be covered by the Cap-and-Trade Program as LADWP would be a covered entity.
<b>Mobile Sources</b>		
<b>AB 1493 (Pavley Regulations).</b> Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	State, CARB	<b>No Conflict.</b> The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards. Mobile emissions associated with the Project in Table IV.F-7 reflect compliance with this regulation.  GHG emissions related to vehicular travel by the Project would benefit from this regulation because vehicle trips associated with the Project would be affected by AB 1493. Mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32 and SB 325.

Action and Strategies	Responsible Party	Would the Project Conflict?
<b>Low Carbon Fuel Standard (Executive Order S-01-07).</b> Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	State, CARB	<p><b>No Conflict.</b> The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards. Mobile emissions associated with the project below in Table IV.F-7 reflect compliance with this regulation.</p> <p>GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of LCFS consistent with reduction of GHG emissions under AB 32 and SB 32</p>
<b>Advanced Clean Cars Program.</b> In 2012, CARB adopted the Advanced Clean Cars (ACC) program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. ACC includes the 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.	State, CARB	<p><b>No Conflict.</b> The standards would apply to all vehicles built during or after 2015 and used by Project residents, employees, and visitors. Vehicles built before the Advanced Clean Cars Program took effect are not subject to the regulation. In accordance with PDF-GHG-2, the Project will pre-wire or install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of on-site parking spaces. In accordance with PDF-GHG-3, at least five (5) percent of the total code-required parking spaces will be equipped with EV charging stations.</p>
<b>SB 375.</b> 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.	State, CARB, SCAG	<p><b>No Conflict.</b> The Project represents an infill development within an existing urbanized area that would concentrate new residential, hotel, and commercial retail uses within a HQT. The Project would also reduce VMT as a result of its urban infill location with access to public transportation within a quarter-mile of the Project Site and its proximity to other destinations, including off-site residential, retail, and entertainment uses and employment opportunities. The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." As discussed in Table IV.F-4, the Project would be consistent with the SCAG RTP/SCS.</p> <p>Furthermore, implementation of the transportation strategies in the 2016-2040 RTP/SCS would result in an estimated 18 percent decrease in per capita GHG emissions by 2035 and 21 percent</p>



Action and Strategies	Responsible Party	Would the Project Conflict?
		decrease in per capita GHG emissions by 2040. As Project-related emissions are reduced by approximately 21 percent compared to NAT (see Table IV.F-7), the Project would also be consistent with GHG reductions in SB 375 and the 2016-2040 RTP/SCS.
<b>Water</b>		
<b>CCR, Title 24.</b> Title 24 includes water efficiency requirements for new residential and non-residential uses.	State, Local Jurisdictions	<b>No Conflict.</b> See discussion under Title 24 and California Green Building Standards Code Requirements above. Additionally, PDF-WS-1 will include the installation of waterless urinals, low-flow shower heads, efficient water heater systems, and drought tolerant landscaping and irrigation systems.
<b>Senate Bill X7-7.</b> 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.	State, DWR	<b>No Conflict.</b> See discussion under Title 24 and California Green Building Standards Code Requirements above. Additionally, PDF-WS-1 will include the installation of waterless urinals, low-flow shower heads, efficient water heater systems, and drought tolerant landscaping and irrigation systems.
<b>Solid Waste</b>		
<b>California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341.</b> 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.	State, Local Jurisdictions	<b>No Conflict.</b> GHG emissions related to solid waste generation from the Project would benefit from this regulation as the Project would reduce the overall amount of solid waste disposed of at landfills. The reduction in solid waste would, in return, reduce the amount of methane released from the decomposing solid waste. The Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in the City, 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 <i>Zero Waste Progress Report</i> (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012. <sup>182</sup>

<sup>182</sup> City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013, <https://bioenergyproducers.files.wordpress.com/2016/11/la-zero-waste-report.pdf>. Accessed February 2019.

Action and Strategies	Responsible Party	Would the Project Conflict?
<b>Other Sources</b>		
<b>Climate Action Team.</b> Reduce diesel-fueled commercial motor vehicle idling.	State, CARB.	<b>No Conflict.</b> The Project would be consistent 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 NAT 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.
Achieve California's 75 percent waste diversion mandate (AB 341 Report to the Legislature, 2015) to reduce GHG emissions.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's waste diversion requirements and the CALGreen Code. The Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in the City, that include mixed waste processing and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets.
Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Local Jurisdictions	<b>No Conflict.</b> At present, there are no street trees on the Project Site's Argyle Avenue or Yucca Street frontages. Under the Landscape Plan, four (4) shade trees would be planted in a four-foot-wide landscape parkway on Argyle Avenue, and eight (8) shade trees would be planted in a four-foot-wide landscape parkway on Yucca Street. Three Washingtonian palms located within the site's two Vista Del Mar Avenue residential lots would be removed and replaced with approximately four street trees. New street trees would be consistent with the City's Bureau of Street Services, Urban Forestry Division standards. The Project would provide landscaping and garden uses that would complement the aesthetic character of the Project Site and enhance its relationship to surrounding buildings. All of the open space areas would have extensive landscaping and well-detailed hardscape. As a result, the Project design would be consistent with this action and help the City to achieve its goal.

Action and Strategies	Responsible Party	Would the Project Conflict?
Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	State, Local Jurisdictions	<b>No Conflict.</b> As discussed previously, the Project would meet this requirement, as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standards.
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	<b>No Conflict.</b> 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 5 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, or applicable version at the time of building permit issuance, as per PDF-AQ-1.
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	<b>No Conflict.</b> 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 would be located within an identified Transit Priority Area and would co-locate complementary commercial/restaurant and residential land uses in proximity to existing off-site commercial, entertainment, and residential uses. The Project is also located in a highly walkable area well-served by frequent and comprehensive transit within a quarter-mile 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.

Action and Strategies	Responsible Party	Would the Project Conflict?
Reduce energy use in private buildings.	State, Local Jurisdictions	<b>No Conflict.</b> The Project would meet this requirement as part of its compliance with the City's requirements, the CALGreen Code, and meeting the LEED Silver Certification level or equivalent green building standards. The Project would commit to reducing building energy by a minimum of 5 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 or applicable version at the time of building permit issuance, as per PDF-AQ-1. The Project would replace older buildings that are energy inefficient with new energy efficient buildings. The Project would utilize energy efficiency appliances and equipment and would meet or exceed the energy standards in the 2016 Title 24 Building Energy Efficiency Standards and the CALGreen Code or applicable version at the time of building permit issuance.

SOURCE: ESA 2019.

According to the 2017 Climate Change Scoping Plan, California is on track to meet its 2050 GHG reduction target as specified in S-3-05.<sup>183</sup> The State's existing and proposed regulatory framework identified in the 2017 Scoping Plan can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 and puts the State on a trajectory to meet the target of reducing GHG emissions 80 percent below 1990 levels by 2050.<sup>184</sup> According to the 2017 Scoping Plan, the reductions needed to achieve the 2030 target are expected to be achieved by specific emission sectors, including sectors that are not directly controlled or influenced by the Project but that nonetheless would contribute to Project-related GHG emissions.<sup>185</sup> For instance, as shown in the 2017 Scoping Plan, State regulations and GHG emission reduction strategies affecting emission sectors, including utility providers, transportation fuel producers, and Cap-and-Trade facilities, would reduce Statewide GHG emissions.<sup>186</sup> As Project-related emissions

<sup>183</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, p. 9, November 2017.

<sup>184</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, p. 18, November 2017.

<sup>185</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, p. 62, November 2017.

<sup>186</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, Table 3, p. 31, November 2017.

are also generated by these same sectors, the Project's GHG emissions would also decline as utility providers and transportation fuel producers, and Cap-and-Trade facilities are subjected to more stringent renewable energy standards and the LCFS.

The 2017 Scoping Plan also calls for doubling energy efficiency savings, including demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration.<sup>187</sup> 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.<sup>188</sup> This strategy requires the CEC, in collaboration with the CPUC, to establish the framework for the energy savings target that outlines the necessary actions that must occur in future years, including workforce education and training institutions engaging with the building industry, mapping industry priorities for efficiency to major occupations that will provide services, identifying workforce competency gaps, and quantifying the work needed to build a workforce to implement high-quality efficiency projects at scale.<sup>189</sup>

Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve the 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 2017 Scoping Plan supporting technical documentation or not currently feasible at the time the 2017 Scoping Plan was adopted could enable the State to meet the 2050 targets.<sup>190</sup> 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.

<sup>187</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, p. 103, November 2017.

<sup>188</sup> California Energy Commission, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016, [http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801\\_20161214\\_T155117\\_Existing\\_Building\\_Energy\\_Efficiency\\_Plan\\_Update\\_December\\_2016\\_Thi.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801_20161214_T155117_Existing_Building_Energy_Efficiency_Plan_Update_December_2016_Thi.pdf). Accessed February 2019.

<sup>189</sup> California Energy Commission, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016, [https://www.energy.ca.gov/efficiency/existing\\_buildings/16-EBP-01/](https://www.energy.ca.gov/efficiency/existing_buildings/16-EBP-01/). Accessed June 2019.

<sup>190</sup> Energy + Environmental Economics (E3), Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 2015, [https://www.ethree.com/public\\_proceedings/summary-california-state-agencies-pathways-project-long-term-greenhouse-gas-reduction-scenarios/](https://www.ethree.com/public_proceedings/summary-california-state-agencies-pathways-project-long-term-greenhouse-gas-reduction-scenarios/); Greenblatt, Jeffrey, "Modeling California Impacts on Greenhouse Gas Emissions," Energy Policy, Vol. 78, 2015, p. 158-172 <https://www.sciencedirect.com/science/article/pii/S0301421514006892>. The California Air Resources Board, California Energy Commission, 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.

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.F-7, below, as the regulatory measures identified by CARB in the 2017 Scoping Plan are implemented, and as other technological innovations occur. Stated differently, the Project's emissions at buildout would likely represent the maximum emissions for the Project as future anticipated regulatory developments and technology advances are expected to reduce future emissions associated with the Project, such as emissions related to electricity use and vehicle use. Given that the Project is consistent with CARB's 2017 Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, as discussed in Table IV.F-3 and Table IV.F-4 (below), and the City's relevant plans, policies, and codes, as discussed below in Table IV.F-5 (below), 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.

*(iii) Southern California Association of Governments 2016-2040 RTP/SCS*

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.<sup>191</sup> The SCAG 2016-2040 RTP/SCS states that "SCAG is required by federal law to prepare and update a long-range (minimum of 20 years) RTP (23 U.S.C.A. §134 et seq)" and "California Senate Bill 375 (SB 375) requires that the RTP also include an SCS, which outlines growth strategies that better integrate land use and transportation planning and help reduce the state's greenhouse gas emissions from cars and light trucks (California Government Code §65080 (b)(2)(B))."<sup>192</sup> 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."<sup>193</sup> 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 "supports sustainable growth through a more compact, infill, and walkable development pattern."<sup>194</sup>

Consistent with SCAG's 2016-2040 RTP/SCS alignment of transportation, land use, and housing strategies, the Project's mixed use design would accommodate anticipated increases in population, households, employment, and travel demand at an infill site that

<sup>191</sup> Southern California Association of Government, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 166, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed June 2019.

<sup>192</sup> Southern California Association of Government, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, p. 15, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed June 2019.

<sup>193</sup> Southern California Association of Governments, Draft Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2015) 3.8-35.

<sup>194</sup> Southern California Association of Governments, Draft Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2015) 3.8-36.

is located close to jobs, shopping and entertainment uses and in close proximity to existing and future public transit stops, where the Project's increased intensity mixed-use development 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. As discussed below, the Project would result in a VMT reduction of approximately 29 percent (based on the calculation protocol from the CAPCOA guidance for land use characteristics LUT-1 through LUT-5 and SDT-1) in comparison to the NAT scenario, and would be consistent with the reduction in transportation emission per capita provided in the 2016-2040 RTP/SCS.

As discussed further below, 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:

- Compact growth in areas accessible to transit;
- New multi-family housing in an infill location with neighborhood-serving retail and restaurant uses;
- Jobs and housing closer to transit;
- New housing and job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

**Table IV.F-4, *Consistency with Applicable SCAG 2016-2040 RTP/SCS Actions and Strategies***, contains a list of GHG-reducing actions and strategies from the SCAG 2016-2040 RTP/SCS that are potentially applicable to the Project, and analyzes the Project's consistency with these actions and strategies. As shown above, the Project would incorporate PDFs and characteristics that reduce vehicle travel consistent with the 2016-2040 SCAG RTP/SCS. 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.

#### *(iv) Local City Plans and Actions*

The significance of the Project's GHG emissions is evaluated based on whether they would be generated in connection with a design that is consistent with relevant City of Los Angeles goals and actions designed to encourage development that results in the efficient use of public and private resources.

**TABLE IV.F-4**  
**CONSISTENCY WITH APPLICABLE SCAG 2016-2040 RTP/SCS ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
<b>Land Use Actions and Strategies</b>		
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, California Transportation Commission (CTC)	<b>No Conflict.</b> While this action applies to local jurisdictions, COGs, SCAG and CTCs, and the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would not impair the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project would support a land use pattern that provides increased opportunity for the use of alternative transportation modes. Additionally, as specified in PDF-AQ-1, the Project will encourage the use of alternative-fueled vehicles. In accordance with PDF-GHG-2, the Project will pre-wire or install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of on-site parking spaces. In accordance with PDF-GHG-3, at least five (5) percent of the total code-required parking spaces will be equipped with EV 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	<b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, the Project would facilitate pedestrian and bicycle movements, including through improvements to the street-level pedestrian environment and connectivity to the surrounding Hollywood area, with pedestrian access to commercial/restaurant uses provided from various at-grade sidewalks equipped with café tables, parkway planters, and bike parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue.
Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities.	SCAG, State, Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions, SCAG and the State, the Project's design and location would have a positive effect on public health issues in regional planning. The Project would incorporate measures to reduce air pollutant emissions, minimize hazards, and ensure water quality. The Project would also incorporate PDF-AQ-1 requiring implementation of green building features. The Project's design would also encourage walking and bicycling and other non-automotive forms of travel to address public health issues. The Project's design would include recreational areas, such as the roof garden on Level 4 of Building 2, and roof garden space on Level 20 of Building 1, as well as a pool deck located on Level 20 of Building 1 that



Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
		<p>is equipped with a pool, spa, gas fire pit, lounge seats, built-in wood seat benches, cabanas, dining tables and chairs, and patios. In addition, the Project would have ready transit access to 8 neighborhood parks, including Selma Park, De Longpre Park, Hollywood Recreation Center, Las Palmas Senior Citizen Center, Yucca Community Center, Wattles Garden Community Park and Runyon Canyon Regional Park, Griffith Park, and Barnsdall Community Park. Community parks serving the Project would include Barnsdall Art Park Recreation Center and Wattles Garden, and the regional parks serving the Project include Runyon Canyon and Griffith Park (See IV.K.4, <i>Parks and Recreation</i>, of this EIR for more information). The Project design would also provide residents, visitors, and guests access to comprehensive transit and alternative methods to commute to work rather than relying on passenger vehicles as the Project Site is located within a quarter mile of the Metro Red Line Hollywood/Vine Station, which provides access to Downtown Los Angeles and connection to Koreatown, Hollywood, and North Hollywood; multiple bus and shuttle lines; the regional freeway system; bicycle lanes; and an established pedestrian grid.</p>
<p>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.</p>	<p>Local Jurisdictions</p>	<p><b>No Conflict.</b> 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 a balanced mix of uses by co-locating complementary commercial/restaurant and residential land uses in proximity to existing off-site commercial, entertainment, and residential uses and being located within an identified Transit Priority Area in a highly walkable area well-served by frequent and comprehensive transit within a quarter-mile of the Project Site.</p>

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
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	<b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, the Project would support the development of complete communities by co-locating complementary commercial/restaurant and residential land uses in proximity to existing off-site commercial, entertainment, and residential uses and being located within an identified Transit Priority Area in a highly walkable area well-served by frequent and comprehensive transit within a quarter-mile of the Project Site. 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-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
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	<b>No Conflict.</b> While this action applies to local jurisdictions and CTCs, the Project would be located within an identified Transit Priority Area and within a quarter mile of the Metro Red Line Hollywood/Vine Station, which provides access to Downtown Los Angeles and connections to Koreatown, Hollywood and North Hollywood; 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 proximity to existing off-site commercial and residential uses.
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions, the Project has been designed to promote physical activity, active transportation and improved health because it would facilitate pedestrian and bicycle movements through and around the Project Site. It would also connect to the surrounding commercial and recreational areas, thereby facilitating pedestrian and bicycle travel. The Project would locate residential, retail, and restaurant uses within an identified Transit Priority Area and within an area that has employment opportunities, restaurants, and entertainment within walking and easy transit distance. As such, the Project would promote physical activity and improved health by providing options for walking and bicycling.

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	<b>No Conflict.</b> 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 would be located within an identified Transit Priority Area and would co-locate complementary commercial/restaurant and residential land uses in proximity to existing off-site commercial, entertainment, and residential uses. The Project would also be located in a highly walkable area well-served by frequent and comprehensive transit within a quarter-mile 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.
<b>Transportation Network Actions and Strategies</b>		
Prioritize transportation investments to support compact infill development that includes a mix of land uses, housing options, and open/park space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	SCAG, CTCs, Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions, SCAG, and CTCs, the Project would be an infill mixed-use development located close to jobs, off-site housing, and shopping and entertainment uses and would be in proximity to existing public transit stops. The development of the Project 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 proximity of the Project to alternative transit modes, including regional rail and bus lines, would support the region's transportation investment and the sustainability of the regional transportation system.
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles.	SCAG, CTCs, Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions, SCAG, and CTCs, the Project would facilitate pedestrian and bicycle movements through and around the Project Site. The Project would create a streetscape that would allow for outdoor café tables, parkway planters, and bicycle parking within an overall landscape design that integrates Project development into the surrounding neighborhood. The Project would provide 258 bicycle parking spaces. It would also connect to the surrounding commercial and recreational areas. The Project would locate residential and commercial/restaurant uses within an area that has public transit, and employment opportunities, restaurants and entertainment within walking

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
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	<p>distance. In accordance with PDF-GHG-2, the Project would pre-wire or install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of on-site parking spaces. In accordance with PDF-GHG-3, at least five (5) percent of the total code-required parking spaces will be equipped with EV charging stations.</p> <p><b>No Conflict.</b> While this action applies to local jurisdictions, SCAG, and CTCs, the Project would develop uses that would bring new employment opportunities and increased density of residential development in an area served by the Metro Red Line Hollywood/Vine Station that provides service to North Hollywood, Hollywood, Downtown Los Angeles, and Koreatown, and provides further connections to the Metro Blue and Expo Lines at the 7th Street/Metro Center Station and the Gold Line at Union 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 in the Hollywood community.</p>
Collaborate with local jurisdictions to provide a network of local community circulators that serve new transit oriented development (TOD), high quality transit areas (HQTAs), and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit.	SCAG, CTCs, Local Jurisdictions	<p><b>No Conflict.</b> While this action applies to local jurisdictions, SCAG, and CTCs, the Project would be located within an identified Transit Priority Area and an HQTA and has many TOD features, such as co-locating complementary commercial/ restaurant and residential uses in proximity to existing off-site commercial, entertainment, and residential uses and being located in a highly walkable area well-served by frequent and comprehensive transit within a quarter-mile of the Project Site. The Project's increases in land use 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. The Project would improve pedestrian connectivity to and the pedestrian experience in the surrounding Hollywood area by providing pedestrian access to commercial/restaurant uses from various at-grade sidewalks and steps equipped with café tables, parkway planters, and bike parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. Enhancing the pedestrian experience would encourage walking and utilization of nearby public transit options.</p>

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options.	CTCs, Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions and CTCs, (as described in TR-MM-1, see Section IV.L, <i>Transportation</i> , of this EIR for more information). The TDM Program (finalized TDM Program to be reviewed and approved by the LADOT) would incorporate commute trip reduction (CTR) marketing that may include new employee orientation of trip reduction and alternative mode options, event promotions, and publications. The Project's TDM Program may also include providing on-site car share amenities and providing rideshare program and a rideshare information center that provides assistance for Project employees and tenants regarding forming carpools or accessing transit alternatives. The Project would also provide pedestrian access to commercial/restaurant uses provided from various at-grade sidewalks and steps equipped with café tables, parkway planters, and bike parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. In accordance with
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	<b>No Conflict.</b> While this action applies to local jurisdictions and CTCs, the Project TDM Program (as described in Mitigation Measure TR-MM-1, see Section IV.L, <i>Transportation</i> , of this Draft EIR for more information) would include a variety of measures that would promote transit use by residents and employees through incentives. The Project's TDM Program (finalized TDM Program to be reviewed and approved by the LADOT) would include transit fare discounts. Refer to Section IV.L, <i>Transportation</i> , of this Draft EIR for information regarding the TDM Program.
Continue to support the California Interregional Blueprint as a plan that links statewide transportation goals and regional transportation and land use goals to produce a unified transportation strategy.	SCAG	<b>No Conflict.</b> While this action applies to SCAG, the Project would support transportation and land use goals through the development of a mixed-use commercial/restaurant and residential project in proximity to existing off-site commercial, entertainment, and residential uses and comprehensive transit. In addition, the Project would be located within an identified Transit Priority Area and in a HQTA, which is defined by the 2016 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or transit corridor with 15-minute or less service frequency during peak commute hours.

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
<b>Transportation Demand Management (TDM) Actions and Strategies</b>		
Examine major projects and strategies that reduce congestion and emissions and optimize the productivity and overall performance of the transportation system.	SCAG	<b>No Conflict.</b> While this action applies to SCAG, in accordance with Mitigation Measure TR-MM-1, the Project would require the Applicant to implement a comprehensive TDM Program (finalized TDM Program to be reviewed and approved by the LADOT) to promote non-automobile travel and improve transportation efficiency by a minimum of 10 percent. The program could include such strategies as unbundling parking; compliance with the State parking cash-out law; providing on-site car share amenities; providing rideshare program and a rideshare information center that provides assistance for Project employees and tenants regarding forming carpools or accessing transit alternatives; and providing both long and short term bicycle parking and other complementary biking amenities. The TDM Program would help optimize the productivity and overall performance of the transportation system serving the Project.
Encourage 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, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors-for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Local Jurisdictions, COGs, SCAG, CTCs	<b>No Conflict.</b> While this action applies to local jurisdictions, COGs, SCAG, and CTCs, the Project is proposed on an infill location and would incorporate pedestrian pathways via sidewalk improvements and landscaping that would connect to the existing sidewalk network. In accordance with PDF-GHG-2, the Project would pre-wire or install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of on-site parking spaces. In accordance with PDF-GHG-3, at least five (5) percent of the total code-required parking spaces shall be equipped with EV charging stations. The Project would provide bicycle parking spaces and facilities. In accordance with Mitigation Measure TR-MM-1, the Applicant shall implement a comprehensive TDM Program (finalized TDM Program to be reviewed and approved by the LADOT) to promote non-automobile travel and reduce the use of single-occupant vehicle trips (refer to Section IV.L, <i>Transportation</i> , of this Draft EIR for additional information).

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, as part of the TDM Program (finalized TDM Program to be reviewed and approved by the LADOT), the Project would include programs that encourage emission reduction strategies, such as carpools and rideshare, bicycle transportation and commuting by providing racks and showers, incentives for use of alternative travel modes, and parking incentives for carpools/vanpools.
Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles (NEVs), and consider collaboration with local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place.	Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions, as part of the TDM Program (finalized TDM Program to be reviewed and approved by the LADOT), the Project may include providing on-site car share amenities, and providing rideshare program and a rideshare information center that provides assistance for Project employees and tenants regarding forming carpools or accessing transit alternatives. The Project would include bicycle parking and showers. In accordance with PDF-GHG-2, the Project would pre-wire or install conduit and panel capacity for electric vehicle charging stations for a minimum of twenty (20) percent of on-site parking spaces. In accordance with PDF-GHG-3, at least five (5) percent of the total code-required parking spaces would be equipped with EV charging stations.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	<b>No Conflict.</b> While this action applies to local jurisdictions and CTCs, due to the service-oriented nature of the 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 impair the City's ability to encourage telecommuting.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	SCAG, Local Jurisdictions	<b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, the Project's residential and commercial development would be located in the urban Hollywood area, which would provide opportunities for bicycling and walking due to the Project's proximity to surrounding nearby land uses, including retail, entertainment destinations, and employment opportunities. The Project would include bicycle parking in compliance with LAMC requirements. In

SOURCE: ESA, 2019

**Table IV.F-5, *Consistency with Applicable City of Los Angeles Green New Deal (Sustainable City pLAN 2019) Goals and Actions***, contain a list of GHG emission-reducing strategies applicable to the Project, and analyzes the Project’s consistency with these GHG emissions-reduction strategies.



As discussed in Table IV.F-5, the Project is consistent with and would not conflict with the applicable goals and actions outlined in the Green New Deal (Sustainable City pLAN 2019). In addition, as discussed below, the Project would result in GHG reductions and would minimize its GHG emissions by incorporating energy efficient design features and VMT reduction characteristics. Generally, the Project's consistency with applicable plans and policies should be demonstrated by a combination of regulatory compliance (Green Building Code, etc.), as well as Project-specific characteristics and voluntary measures (e.g., PDFs). The Project would incorporate the identified PDFs and water conservation, energy conservation, tree-planting, and other features consistent with these plans.

**TABLE IV.F-5**  
**CONSISTENCY WITH APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL**  
**(SUSTAINABLE CITY PLAN 2019) GOALS AND ACTIONS**

<b>Target</b>	<b>Would the Project Conflict?</b>
<b>Chapter 3: Local Water</b>	
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.	<b>No Conflict.</b> While this action primarily applies to the City and LADWP and not to individual projects, the Project design incorporates water efficiency measures defined in PDF-AQ-1. The Project will also include water conservation features described in PDF-WS-1.
<b>Chapter 4: Clean and Healthy Buildings</b>	
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).	<b>No Conflict.</b> 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 State of CALGreen Code and the Green Building Code and meet the standards of the USGBC LEED Silver Certification level or its equivalent. The Project would optimize building energy performance as stated in PDF-AQ-1 and reduce water consumption (thus reducing energy consumption associated with the supply, conveyance, distribution, and treatment of water) as stated in PDF-AQ-1 and PDF-WS-1. As a result, the Project would be in substantial conformance 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.	<b>No Conflict.</b> 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.
<b>Chapter 5: Housing &amp; Development</b>	
Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.	<b>No Conflict.</b> The Project includes 210 multi-family residential units, which would help the City achieve its new housing goals.

Target	Would the Project Conflict?
Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.	<b>No Conflict.</b> The Project proposes a 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 a half-mile of the Project Site, including the Metro Red Line Hollywood/Vine Station, and within 1,500 feet of many Metro bus routes (e.g., 180/181, 210, 212, 217, 222, 2/302, 780) and LADOT Dash Beachwood and Hollywood lines (see Section IV.L, <i>Transportation</i> , of this Draft EIR for additional information regarding the Project's access to transit). As a result, the Project's location and design are consistent with and would not conflict with this City action.
<b>Chapter 6: Mobility &amp; Public Transit</b>	
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.	<b>No Conflict.</b> The Project design and location would promote walking and bicycling by providing convenient access to and from on-site uses. The Project would provide parking for approximately 258 bicycles on-site to encourage utilization of alternative modes of transportation. The Project would improve the street-level pedestrian environment and connectivity to the surrounding Hollywood area, with pedestrian access to commercial/restaurant uses provided from various at-grade sidewalks and steps equipped with café tables, parkway planters, and bike parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. Furthermore, the Project would place housing, hotel, and commercial/restaurant uses within a half-mile of the Project Site, including the Metro Red Line Hollywood/Vine Station, and within 1,500 feet of many Metro bus routes (e.g., 180/181, 210, 212, 217, 222, 2/302, 780) and LADOT Dash Beachwood and Hollywood lines. In summary, the Project would provide an internal pedestrian network for Project visitors and residents that links to the existing off-site pedestrian network, including existing off-site sidewalks, which would encourage walking, biking, and micro-mobility/matched rides or transit. 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.	<b>No Conflict.</b> While this action applies to the City and not to individual projects, as indicated in the vehicle miles traveled analysis in Appendix L-1 of the Draft EIR, the results of the analysis show that with the Project, with implementation of mitigation measure MM TRAF-1, the household VMT per capita would be 6.0 compared to the threshold of 6.0. Therefore, it has been concluded that the Project would not cause significant VMT impacts. It is also noted that the threshold for household VMT per capita at 6.0 is set at 15 percent below the average for the Central Area, indicating that the baseline Central Area value is 7.1. Therefore, the Project's household VMT per capita is below the threshold below the average for the Central Area.

Target	Would the Project Conflict?
<b>Chapter 7: Zero Emission Vehicles</b>	
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.	<b>No Conflict.</b> 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 PDF-GHG-2 and PDF-GHG-3. As a result, the Project would be in substantial conformance with and would not conflict with this action.
<b>Chapter 9: Waste &amp; Resource Recovery</b>	
Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.	<b>No Conflict.</b> 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).	<b>No Conflict.</b> 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.	<b>No Conflict.</b> 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.
<b>Chapter 11: Urban Ecosystems &amp; Resilience</b>	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.	<b>No Conflict.</b> While this action applies to the city in general, and not specifically to individual private development, the Project would include a roof garden on Level 4 of Building 2 and roof garden space on Level 20 of Building 1, and therefore the Project would incorporate heat island reduction strategies for the Project roof areas. 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.

Target	Would the Project Conflict?
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.	<b>No Conflict.</b> The Project would provide open space for residents, hotel guests, and the public. Building 1 would include the following open space areas: a 10,610 square-foot podium courtyard (Level 4); a 3,740 square-foot roof garden (Level 20); and 8,500 square feet of private residential balconies. Thus, Building 1 would provide a total of 22,850 square feet of open space. Building 2 would include 375 square-feet of amenity space on Level 1; an 875 square-foot roof garden; and 250 square feet of private balconies. Thus, Building 2 would provide 1,500 square feet of open space. The outdoor open space areas for Buildings 1 and 2 are illustrated on Figures II-14 and II-15. Overall, the Project would provide a total of 24,350 square feet of open space, which would exceed the City's 24,150 square foot open space requirement, as discussed further in Section IV.H, Land Use and Planning, of this Draft EIR. As a result, the Project is consistent with and would not conflict with this City action.

SOURCE: City of Los Angeles, Green New Deal, 2019; ESA, January 2020

#### (b) Los Angeles Green Building Code

By incorporating PDF-AQ-1 and PDF-WS-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 PDF-AQ-1 the Project would be designed to optimize energy performance and reduce building energy cost by a minimum of 5 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.

#### (v) Conclusion

Given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction plans, strategies, goals and objectives, the Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. Therefore, under the thresholds adopted by the City for this Project, it is concluded that the Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable.

(b) *Construction Emissions*

As explained above in subsection IV.F.3.b)(1)(a), *Construction Emissions*, the GHG emissions associated with construction of the Project were calculated for each year of construction using CalEEMod. Detailed emissions calculations are provided in Appendix G. Results of the GHG construction emissions calculations are presented in **Table IV.F-6, Estimated NAT Scenario and Project Scenario Construction GHG Emissions**. Although the GHG emissions that are generated during construction are considered to be one-time emissions, SCAQMD guidance directs that they be amortized over 30 years and included when assessing all of the long-term GHG emissions associated with the Project's lifetime, which is defined in the SCAQMD's *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* as 30 years.<sup>195</sup> The existing uses at the Project Site would cease to operate when construction of the Project commences.

**TABLE IV.F-6**  
**ESTIMATED NAT SCENARIO AND PROJECT SCENARIO CONSTRUCTION GHG EMISSIONS**

<b>Emission Source</b>	<b>CO<sub>2</sub>e (Metric Tons) <sup>a,b</sup></b>
Construction Year 1	1,361
Construction Year 2	759
Total	2,120
Amortized Construction	71

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix G.

<sup>b</sup> CO<sub>2</sub>e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report (AR4).

SOURCE: ESA, 2019.

(c) *Operational Emissions*

As explained above in subsection IV.F.3.b)(1)(b), *Operational Emissions*, the GHG emissions associated with operation of the Project were calculated using CalEEMod, taking into account the Project's compliance with the portions of the Los Angeles Green Building Code applicable to residential and mixed-use development, as well as the Project's incorporation of those green building features in PDF-AQ-1 that have targets that can be quantified in the analysis. Physical and operational Project characteristics for which sufficient data are available to quantify the reductions from building energy and resource consumption were also included in the quantitative analysis, and included but were not limited to the following features: installation of energy-efficient appliances; low-water fixtures; water efficient irrigation; and reduced building energy usage to meet the Title 24 standards. The default CalEEMod factors do not include reductions from these

<sup>195</sup> South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf)

features; therefore, it was appropriate to include these reductions in the model calculations. Detailed emissions calculations are provided in Appendix G.

The Project's maximum annual net GHG emissions resulting from motor vehicles, energy (i.e., electricity, natural gas), water conveyance, and waste sources were calculated based on the expected occupancy year of 2022. The maximum occupancy year GHG emissions from operation of the Project are shown in **Table IV.F-7, *Estimated Combined Amortized Construction and Operational NAT Scenario and Project Scenario Opening Year GHG Emissions***. It is noted that the Project's net GHG emissions do not reflect GHG emissions offsets that the Project would obtain to achieve net zero GHG emissions as discussed in subsection IV.F.4, *Jobs and Economic Improvement Through Environmental Leadership*, below.

**TABLE IV.F-7**  
**ESTIMATED COMBINED AMORTIZED CONSTRUCTION AND OPERATIONAL NAT SCENARIO AND PROJECT SCENARIO OPENING YEAR GHG EMISSIONS**

Emissions Sources	Project CO <sub>2</sub> e (Metric Tons per Year) <sup>a</sup>		
	Project NAT Scenario - Without GHG Reduction Characteristics, Features, and Measures <sup>b</sup>	Proposed Project <sup>b</sup>	Percent Reduction
<b>Project Opening Year Operations</b>			
Electricity	761	734	4%
Natural Gas	323	315	2%
Mobile Sources	2,547	1,815	29%
EV Charging Stations	10	10	-
Solid Waste	72	72	-
Water and Wastewater	135	108	20%
Area <sup>c</sup>	54	4	93%
Emergency Generator	7	7	-
<b>Operational Total</b>	<b>3,909</b>	<b>3,063</b>	<b>22%</b>
<b>Amortized Construction</b>	<b>71</b>	<b>71</b>	<b>-</b>
<b>Total Net Emissions</b>	<b>3,980</b>	<b>3,134</b>	<b>21%</b>

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix G.

<sup>b</sup> CO<sub>2</sub>e emissions are were calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report.

<sup>c</sup> Proposed Project area source emissions were adjusted to exclude natural gas-fueled fireplaces per PDF-AQ-1.

SOURCE: ESA, 2019.

As discussed above in subsection IV.F.2.b)(2), *Existing Project Site Greenhouse Gas Emissions*, for the purposes of this analysis, no existing operational greenhouse gas emissions were assumed from the existing site uses and the Project's greenhouse gas emissions are conservatively considered to be net new operational emissions.

It is important to note that the total net Proposed Project Scenario emissions in Table IV.F-7 report the Project's expected maximum annual net GHG emissions, and do not reflect the fact that Project operational-related GHG emissions would decline in future years as emissions reductions resulting from the State's Cap-and-Trade program are fully realized. Indirect emissions related to electricity would also decline as utility providers, including LADWP, meet their RPS obligations to provide electricity from 33 percent renewable electricity sources by 2020. Future regulations would also be implemented to increase the percentage of electricity from renewable electricity sources to 50 percent by 2030 consistent with SB 350, which would achieve additional reductions in emissions from electricity demand. Emissions from mobile sources would also decline in future years as older vehicles are replaced with newer vehicles, resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards.

Table IV.F-7 shows that the Project's total net emissions of 3,134 MTCO<sub>2</sub>e would be approximately 21 percent below the Project's total net emissions that would be generated by the Project under the NAT Scenario, which does not include the Project's implementation of GHG reduction characteristics, features, and measures, and the Project's net operational emissions of 3,063 MTCO<sub>2</sub>e would be approximately 22 percent below the Project's net operational emissions that would be generated by the Project under the NAT Scenario. The approximately 22 percent reduction in net operational Project GHG emissions is due to the following primary factors:

- **Reduction in vehicle trips and VMT associated with Project Site location and Project design.** The Project Site is an infill site located near transit in a highly walkable environment. The Project is designed as a mixed-use development that would increase the existing density in a Transit Priority Area. The Project's location and its design features and characteristics account for an approximately 29 percent reduction in Project VMT and associated emissions and an approximately 18 percent reduction in operational net total Project GHG emissions.
- **Project Design Feature (PDF-AQ-1):**
  - Accounts for the design feature that residential units within the Project will not include the use of natural gas-fueled fireplaces, which result in an approximate 1.3 percent reduction in operational net total Project GHG emissions.
- **Green Building Features**
  - Accounts for an approximately 20 percent reduction in indoor and outdoor potable water use, which result in an approximate 0.7 percent reduction in operational net total Project GHG emissions.

- Accounts for an approximate 5 percent increase in optimizing energy performance resulting in an approximate 5 percent reduction in Title 24 (2016) building energy cost, and an approximate 0.9 percent reduction in operational net total Project GHG emissions.

As discussed above in subsection IV.F.2.a)(2)(d)(ii), *2017 Climate Change Scoping Plan*, the 2017 Climate Change Scoping Plan proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, which includes direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system. The 2017 Climate Change Scoping Plan presents the strategies and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels, which strategies expand upon the GHG reduction policies and programs needed to meet the 2020 target, which the 2017 Climate Change Scoping Plan assumes are already in place.<sup>196</sup> As the quantification of the Project's total net GHG emissions shows (without accounting for GHG offsets), the Project includes characteristics and features that achieve reductions of GHG emissions that do not conflict with GHG reduction measures identified in the 2017 Climate Change Scoping Plan. As stated above, this discussion is not presented as a method for assessing the significance of the Project's GHG impacts; instead, it is presented to disclose the level of the Project's GHG emissions and compare its emissions to those of a project without the Project's GHG emission-reducing characteristics, features and design to demonstrate the efficacy of the Project's characteristics, features and design, and, in doing so, provide additional support for the assessment of the Project's consistency with plans and policies adopted for the purpose of reducing GHG emissions, which the City has determined to use as the indicator of significance under the Appendix G Thresholds.

A discussion of the Project's achievement of no net increase in annual GHG emissions for future years is provided in subsection IV.F.4, *Jobs and Economic Improvement Through Environmental Leadership*, below.

## (2) Conclusion

In conclusion, the analyses of the Project's consistency with applicable regulatory plans and policies to reduce GHG emissions, supported by the GHG emissions analysis provided above, demonstrate that the Project would be consistent with and would not conflict with the GHG reduction actions and strategies contained in CARB's 2017 Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, and the City's Green New Deal (Sustainable City pLAn 2019) and Green Building Code. **The Project's consistency with these applicable regulatory plans, policies, codes and actions to reduce GHG emissions, along with its incorporation of PDFs discussed in this and other sections of this Draft EIR, particularly PDF-AQ-1 (Green Building Features), would**

<sup>196</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).



**substantially minimize the Project's GHG emissions. The Project's GHG emission impacts would be less than significant, and no mitigation measures are required.**

### **e) Cumulative Impacts**

CEQA requires that lead agencies consider evaluating the cumulative impacts of projects that have even relatively small impacts, since even small contributions to a cumulative impact (from which significant effects are occurring and are expected to worsen over time) may potentially be considerable and therefore significant. In the case of global climate change, the proximity of the Project to other GHG-generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. Further, as stated above, GHG emission impacts are by their very nature cumulative as both the California Natural Resources Agency and CAPCOA have recognized.<sup>197</sup>

Although the Project would 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 emissions from more than one project and from 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 cumulative State or global GHG emissions, and, consequently, they would, in isolation, have no significant direct impact on climate change.<sup>198</sup> As discussed above, currently, there are no applicable CARB, SCAQMD, or City significance thresholds or specific reduction targets, and there is 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 an individual project represent new emissions or existing, displaced emissions. Therefore, as discussed above in subsection IV.F.3.b), *Methodology*, consistent with State CEQA Guidelines Section 15064(h)(3), the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions under the Appendix G thresholds would be less than significant if the Project is consistent with applicable regulatory plans and policies to reduce GHG emissions including CARB's 2017 Climate Change Scoping Plan, SCAG's 2016-2040 RTP/SCS, and the City's Green New Deal (Sustainable City pLAn 2019), and Green Building Code.

As discussed in subsection IV.F.3.(d)(1), *Project Consistency with Applicable Plans and Policies*, above, the Project is consistent with and does not conflict with State, regional, and local plans, policies, and codes. This determination of consistency is supported by Table IV.F-7 in subsection IV.F.3.d)(1)(c), *Operational Emissions*, above, which illustrates that development of the Project, including incorporation of its Project

<sup>197</sup> California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22-26, [http://resources.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf).

<sup>198</sup> The Project's net operational GHG emissions (without offsets) in the opening year would comprise approximately 0.0007 percent of California's GHG emissions (based on CARB's 2015 inventory) and 0.000004 percent of global emissions (based on IPCC AR5 inventory).

Design Features, its land use characteristics, and design (as described in subsection IV.F.3.c), *Project Design Features*, above), would substantially reduce its GHG emissions as compared to the Project NAT Scenario.

As demonstrated by Table IV.F-3, above, the Project is consistent with the approach outlined in CARB's 2017 Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities for achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's 2017 Climate Change Scoping Plan, the Project would incorporate "green building" features as a framework for achieving its GHG emissions reductions, as its new buildings would be designed to achieve the standards of the Silver Rating under LEED.

The 2016-2040 RTP/SCS incorporates strategies to reduce per capita VMT within the region in order to achieve the 2020 and 2035 per capita VMT reduction targets established by CARB, which would result in per capita GHG emission reductions associated with vehicle travel. As demonstrated by Table IV.F-4 in subsection IV.F.3.d)(1)(a)(iii) above, the Project is consistent with the strategies and goals of the 2016-2040 RTP/SCS, as it would support and be consistent with relevant and applicable GHG emission reduction strategies in the 2016-2040 RTP/SCS. These strategies include providing residences and retail uses in an urban infill location and within a relatively short distance of existing transit stops; providing employment near current transit stops and neighborhood commercial centers; and supporting alternative and electric vehicles through the installation of on-site electric vehicle charging stations. Moreover, as shown in Table IV.F-7 in subsection IV.F.3.d)(1)(c) above, the Project results in a VMT reduction of approximately 29 percent in comparison to the NAT scenario (corresponding to a GHG emissions reduction of approximately 18 percent in comparison to the NAT scenario). Therefore, the Project would achieve a per capita VMT reduction of approximately 29 percent in comparison to the NAT scenario and would, for that reason as well, be consistent with the 2016-2040 RTP/SCS.

As discussed above and shown in Table IV.F-5, the Project also would comply with the Green New Deal (Sustainable City pLAn 2019), which emphasize improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's compliance with regulatory requirements and implementation of Project Design Features and land use characteristics provided above and throughout this Draft EIR and MM TRAF-1 in Section IV.L, Transportation, of this Draft EIR, would advance these objectives.

As discussed in Section IV.B, *Air Quality*, and in Section IV.H, *Land Use and Planning*, of this EIR, the Project would also be consistent with applicable land use policies of the City of Los Angeles and of SCAG pertaining to air quality, including policies relating to the reduction of GHG emissions. In addition, implementation of PDF-AQ-1 would exceed minimum regulatory requirements, and, as discussed throughout this Draft EIR, the Project would incorporate sustainability design features in accordance with regulatory requirements and Project Design Features, and implement mitigation measures, to

reduce VMT and to reduce or avoid the Project's potential impacts with respect to GHG emissions.

With incorporation and implementation of these features and measures, the Project would result in an approximately 21 percent reduction in net total Project GHG emissions as compared to the NAT scenario. The Project's GHG reduction measures and the Project's consistency with CARB's 2017 Climate Action Scoping Plan, SCAG's 2016-2040 RTP/SCS, and the City's Green New Deal (Sustainable City pLAn 2019), and Green Building Code render the Project consistent with AB 32 and SB 32. The NAT and Project scenario comparison demonstrates the efficacy of the measures contained in these policies.

Furthermore, the overwhelming majority of the Project-related GHG emissions are generated from source sectors that include electricity, generated in-state or imported, and the combustion of transportation fuels. These sectors are already covered entities under the Renewables Portfolio Standard and Cap-and-Trade Program and, as such, are separately regulated and would be reduced sector-wide in accordance with the goals of AB 32 and SB 32, in addition to the previously discussed GHG emissions reductions from the Project-specific energy efficiency design features, and VMT-reducing land use characteristics of the Project.

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 would 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 would ensure that the GHG reduction targets of AB 32 and SB 32 are met. Thus, given the Project's consistency with State, SCAG, and City of Los Angeles 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 emission of GHGs. **Given this consistency, it is concluded from the discussion above that the Project's GHG emission impacts would not be cumulatively considerable.**

## **f) Mitigation Measures**

The Project's GHG emissions would result in less than significant impacts. Therefore, no mitigation measures are required.

## **g) Level of Significance After Mitigation**

Project-level and cumulative impacts associated with the Project's GHG emissions would be less than significant without mitigation.

## 4. 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*, which would allow the Project to qualify for streamlined environmental review under CEQA. The *Jobs and Economic Improvement Through Environmental Leadership Act* requires, among other things, the Project, upon completion to qualify for LEED Silver 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 Silver 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 as a result of the purchase of emission offset credits. The Environmental Leadership Development Project certification and other related documentation are provided in Appendix G of this Draft EIR.

The Project would demolish the existing uses and develop 197,964 net square feet of residential uses (or approximately 241,060 gross square feet of residential uses – including common areas, corridors, and shafts) within 210 multi-family residential units; approximately 57,945 net square feet of hotel use (or approximately 81,000 gross square feet of hotel uses) with 136 hotel rooms; and 12,570 square feet of commercial/restaurant uses. 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, vehicle miles traveled, energy and water demand, and associated GHG emissions. The Project is pursuing LEED Silver Certification. The USGBC LEED Energy and Atmosphere Credit 7 [v4] requires that a project provide green power or RECs/carbon offsets for a minimum of five years. The Project would consistently obtain carbon offsets to bring net zero carbon emissions each year. Therefore, the Project would not result in net 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* would be available from the Office of Planning and Research at the following website: <http://opr.ca.gov/ceqa/california-jobs.html>.

## **IV. Environmental Impact Analysis**

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### **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 utilizes and relies on the *Preliminary Drainage Study* prepared by Southland Civil Engineering & Survey, LLP in July 2017, which is included as Appendix H of this Draft EIR.

#### **2. Environmental Setting**

##### **a) Regulatory Setting**

###### **(1) Federal**

###### **(a) Clean Water Act**

The Clean Water Act was first introduced in 1948 as the Water Pollution Control Act, and became known as the Clean Water Act as a result of broad amendments adopted in 1972 (33 U.S.C Sections 1251 et seq., 1972). The Clean Water Act authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. The primary goals of the Clean Water Act are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. As such, the Clean Water Act forms the basic national framework for the management of water quality and the control of pollutant discharges. The Clean Water Act also sets forth a number of objectives in order to achieve the above-mentioned goals. These objectives include regulating pollutant and toxic pollutant discharges; providing for water quality that protects and fosters the propagation of fish, shellfish and wildlife; developing waste treatment management plans; and developing and implementing programs for the control of non-point sources of pollution.

Since its introduction, major amendments to the Clean Water Act have been enacted (e.g., 1961, 1966, 1970, 1972, 1977, and 1987). Amendments enacted in 1970 created the U.S. Environmental Protection Agency (USEPA), while amendments enacted in 1972 deemed the discharge of pollutants into waters of the United States from any point source unlawful unless authorized by a USEPA National Pollutant Discharge Elimination System (NPDES) permit. Amendments enacted in 1977 mandated development of a "Best Management Practices" Program at the state level and provided the Water Pollution

Control Act with the common name of “Clean Water Act,” which is universally used today. Amendments enacted in 1987 required the USEPA to create specific requirements for discharges.

In response to the 1987 amendments to the Clean Water Act and as part of Phase I of its NPDES permit program, the USEPA began requiring 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) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs 5 acres or more of land. Phase II of the USEPA’s NPDES permit program, which went into effect in early 2003, extended the requirements for NPDES permits to: (1) numerous small municipal separate storm sewer systems, (2) construction sites of 1 to 5 acres, and (3) industrial facilities owned or operated by small municipal separate storm sewer systems. The NPDES permit program is typically administered by individual authorized states.

In 2008, the USEPA published draft Effluent Limitation Guidelines for the construction and development industry. On December 1, 2009, the USEPA finalized its 2008 Effluent Guidelines Program Plan.

In California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB). The SWRCB was created by the Legislature in 1967. Its joint authority over water distribution and water quality protection allows the Board to provide protection for the State’s waters, through its nine Regional Water Quality Control Boards (RWQCBs). 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. The RWQCBs develop “basin plans” for their hydrologic areas, issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality

In addition, the Clean Water Act requires states to adopt water quality standards for receiving water bodies and to have those standards approved by the USEPA. Water quality standards are determined to protect designated beneficial uses for 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 which represent the quality of water that support a particular use.

When designated beneficial uses of a particular receiving water body are being compromised by water quality, Section 303(d) of the Clean Water Act requires identifying and listing that water body as “impaired.” Once a water body has been deemed impaired, a Total Maximum Daily Load (“TMDL”) must be developed 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, the TMDL allocates the

loads among current and future pollutant sources to the water body. The Clean Water Act 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, is based on violations of water quality standards.

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 for Waters of the U.S.<sup>1</sup> and identify methods for implementing them.<sup>2</sup> 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 and is administered by the USEPA. Under SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. The drinking water standards established in the SDWA, as set forth in the CFR, are referred to as the National Primary Drinking Water Regulations (Primary Standards, Title 40, CFR Part 141) and the National Secondary Drinking Water Resources Regulations (Second Standards, 40 CFR Part 143). California passed its own Safe Drinking Water Act in 1986 that authorizes the State's Department of Health Services (DHS) to protect the public from contaminants in drinking water by establishing maximum concentration levels (MCLs), as set forth in California Code of Regulations (CCR), Title 22, Division 4, Chapter 15, that are at least as stringent as those developed by the USEPA, as required by the federal Safe Drinking Water Act.

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<sup>1</sup> Waters of the U.S. are defined by the EPA as any navigable stream, river, or water body in the United States. Please see the EPA website for the detailed current and pending definitions. <https://www.epa.gov/cwa-404/definition-waters-united-states-under-clean-water-act>. Accessed November 2017.

<sup>2</sup> Code of Federal Regulations, Title 40, Section 131.12.

## (2) State and Regional

### (a) *Porter-Cologne Water Quality Act (Porter-Cologne Act)*

The Porter-Cologne Water Quality Control Act<sup>3</sup> established the legal and regulatory framework for California's water quality control. The Porter-Cologne Act authorizes the SWRCB to implement the provisions of the federal Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

Under the Porter-Cologne Act, the State of California is divided into nine RWQCBs, governing the implementation and enforcement of the California Water Code and the federal Clean Water Act. The Project Site is located within Region 4, also known as the Los Angeles Region, and is within the Los Angeles RWQCB or LARWQCB. 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 Porter-Cologne Act and established by the SWRCB. The RWQCB is also given authority to issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor water quality.<sup>4</sup> In California, the NPDES stormwater permitting program is administered by the SWRCB.

Section 13050 of the California Water Code, 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.<sup>5</sup> Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State, not just to surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, the existing higher quality shall be maintained, and that discharges to that water body shall not unreasonably affect present or anticipated beneficial uses of such water resource.

<sup>3</sup> California Water Code Sections 13000 et seq.

<sup>4</sup> U.S. Environmental Protection Agency - Clean Water Act. July 2011. Available at: <https://www.epa.gov/laws-regulations/summary-clean-water-act>. Accessed August 27, 2019.

<sup>5</sup> State Water Resources Control Board Resolution No. 68-16. Available at: [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/1968/rs68\\_016.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1968/rs68_016.pdf). Accessed April 14, 2018



(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. The EPA 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. As relevant to the Project, 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 and estuaries that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

(d) *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*

As required by the Porter-Cologne Act, discussed above, the LARWQCB has adopted a plan entitled "Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties" (Basin Plan).<sup>6</sup> Specifically, the Basin Plan designates beneficial uses for the surface and groundwaters within Region 4, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation 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 policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan.

The Basin Plan is a resource for the RWQCB 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.

(e) *Ballona Creek Watershed Management Master Plan*

The Ballona Creek Watershed Management Master Plan is an outgrowth of the efforts of the Ballona Creek Watershed Task Force, a stakeholder group formed in 2001 by the Department of Public Works, the Santa Monica Bay Restoration Commission, the City of Los Angeles, and Ballona Creek Renaissance to collectively set forth a strategy to develop pollution control and habitat restoration actions that could achieve an ecologically healthy watershed.<sup>7</sup> The Plan provides an assessment of existing environmental conditions, establishes goals and objectives to achieve an ecologically healthy

<sup>6</sup> Los Angeles Regional Water Quality Control Board, LARWQCB Basin Plan, [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/](http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/). Accessed April 23, 2017.

<sup>7</sup> Los Angeles County Department of Public Works, Ballona Creek Watershed Management Plan, September 2004, <http://www.ladpw.org/wmd/watershed/bc/bcmp/masterplan.cfm>. Accessed November 2017.

watershed, identifies methods to achieve specific water quality improvements, recognizes opportunities for habitat restoration, develops a community-based watershed monitoring plan, and identifies existing and future funding sources for Plan implementation. With regard to individual development projects, the Plan calls for implementation of Best Management Practices (BMPs) to reduce contaminants in dry weather flows and stormwater flows and to reduce the volume of stormwater flows.

(f) *National Pollutant Discharge Elimination System Permit Program (NPDES)*

As indicated above, in California, the NPDES stormwater permitting program is administered by the SWRCB through the nine RWQCBs. SWRCB Order No. 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-006-DWQ) established the statewide NPDES Construction General Permit for stormwater discharges from construction sites. This NPDES permit establishes a risk-based approach to stormwater control requirements for construction projects.

(i) *Construction: Stormwater Pollution Prevention Plan*

For all construction activities disturbing more than one acre of land, the Construction General Permit mandates the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP documents the selection and implementation of Best Management Practices (BMPs) for the specific construction project, charging the Owner of the Project with stormwater quality management responsibilities. A construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit.

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.

A SWPPP is meant to identify potential sources and types of pollutants associated with the construction activity and to list the BMPs that would prohibit those 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., 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 to protect the soil surface and prevent soil particles from detaching. Selection of the appropriate erosion control BMPs would be based on minimizing the areas of disturbance, stabilizing the disturbed areas, and protecting

slopes/channels. Such BMPs may include, but would not be limited to, the use of geotextiles and mats, earth dikes, drainage swales, and slope drains.

- Sediment Control BMPs are 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, the 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. The Project Site would have a stabilized construction site 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 of waste materials into stormwater runoff or discharges through the proper management of construction waste.

To obtain coverage under the Construction General Permit, a developer is required to file a Notice of Intent (NOI) with the SWRCB and provide proof of the NOI prior to applying for a grading or building permit from the local jurisdiction, and must prepare a SWPPP that incorporates the minimum BMPs required under the General Permit as well as appropriate project-specific BMPs. The SWPPP must be completed and certified by the developer and the BMPs implemented prior to the commencement of construction, and may require modification by a developer during the course of construction as conditions warrant. When project construction is complete, the developer is required to file a Notice of Termination with the governing RWQCB certifying that all the conditions of the Construction General permit, including conditions necessary for termination, have been met.

The City of Los Angeles supports the policies of the Construction General Permit through the City’s *Development Best Management Practices Handbook, Part A: Construction Activities*, 3<sup>rd</sup> edition<sup>8</sup>, and associated ordinances, which the City adopted in September 2004. The Handbook and ordinances also have specific minimum BMP requirements for construction sites.

<sup>8</sup> City of Los Angeles, Best Management Practices Handbook, Part A, available at: [http://www.lastormwater.org/wp-content/files\\_mf/parta.pdf](http://www.lastormwater.org/wp-content/files_mf/parta.pdf). Accessed April 14, 2018.

(ii) *NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering*

A NPDES Permit for dewatering discharges was adopted by the LARWQCB on June 6, 2013 (Order No. R4-2013-0095, General NPDES Permit No. CAG994004). Similar to the Construction General Permit, to be authorized to discharge under this Permit, the developer must submit a NOI to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this Permit.<sup>9</sup>

(iii) *Operations*

In accordance with Section 402(p) of the Clean Water Act, 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 storm sewer system MS4 Permit, which applies to publically-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 certain types of 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 and constructed to treat or filter the greater of an 85<sup>th</sup> percentile rain event or first 0.75 inch of stormwater runoff from a storm event.

(3) **Local**

(a) *County of Los Angeles Hydrology Manual*

Drainage and flood control plans in the City are subject to review and approval by the LADPW the City of Los Angeles Bureau of Engineering (Bureau of Engineering). Storm drains within the City are constructed by both the City and the Los Angeles County Flood Control District (County Flood Control District). The County Flood Control constructs and

<sup>9</sup> Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, 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, June 6, 2013, [http://www.waterboards.ca.gov/losangeles/board\\_decisions/adopted\\_orders/permits/general/npdes/r4-2013-0095/Dewatering%20Order.pdf](http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/permits/general/npdes/r4-2013-0095/Dewatering%20Order.pdf). Accessed November 2017.

has jurisdiction over regional facilities such as major storm drains and open flood control channels, while the City constructs and is responsible for local interconnecting tributary drains.

The City implements the Los Angeles County Department of Public Works' Hydrology Manual as its basis of design for storm drainage facilities. The Department of Public Works' 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<sup>10</sup> are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event.<sup>11</sup> The County also limits the allowable discharge into existing storm drain facilities based on the MS4 Permit and, as such, enforces stormwater discharge limitations on all new developments that discharge directly into the County's storm drain system.

Drainage and flood control structures and improvements within the City are subject to review and approval by LADPW and the Department of Building and Safety. As required by the LADPW, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. LADPW reviews and approves storm drain plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned storm drain facilities, such as catch basins and storm drain lines, require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements.

*(b) Operation: Los Angeles County Municipal Stormwater NPDES Program*

The County of Los Angeles and the City are Co-Permittees in the MS4 Permit (NPDES Permit No. CAS004001) under the municipal stormwater NPDES Permit for Los Angeles County. In 2012, the LARWQCB updated the NPDES Permit and Waste Discharge Requirements (Permit No. CAS004001, Order No. R4-2012-0175) under the Clean Water Act and the Porter-Cologne Act for discharges of urban runoff in public storm drains in Los Angeles County. The MS4 Permit (Part VI.D.7.c, New Development/Redevelopment Project Performance Criteria) includes design requirements for new development and substantial redevelopment. These requirements apply to all projects that create or replace more than 5,000 square feet of impervious cover. Where redevelopment results in an alteration to more than 50 percent of impervious surfaces of a previously existing development and the existing development was not subject to post-construction stormwater quality control requirements, the entire project would be subject to post-construction stormwater quality control measures.

<sup>10</sup> A sump or depression is an area from which there is no surface flow outlet.

<sup>11</sup> Los Angeles County Department of Public Works Hydrology Manual, January 2006, [http://ladpw.org/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://ladpw.org/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf). Accessed September 2014.

Under the 2012 MS4 Permit, the County and City are required to implement development planning guidance and control measures that control and mitigate stormwater quality and quantity impacts to receiving waters as a result of new development and redevelopment. The County and the City also are required to implement other municipal source detection and elimination programs, as well as maintenance measures.

The 2012 MS4 contains provisions for implementation and enforcement of the stormwater quality management program. The objective of the Stormwater Quality Management Program is to reduce pollutants in urban stormwater dischargers to the “maximum extent practicable,” to obtain water quality objectives and protect the beneficial uses of receiving waters in Los Angeles County. Special provisions are provided in the 2012 MS4 Permit to facilitate implementation of the Stormwater Quality Management Program. In addition, the 2012 MS4 Permit requires that permittees to implement an LID, as discussed above, that designates BMPs that must be used in specified categories of development projects to infiltrate water, filter, or treat stormwater runoff; control peak flow discharge; and reduce the post-project discharge of pollutants from stormwater conveyance systems.

The City of Los Angeles supports the requirements of the 2012 MS4 Permit through the City of Los Angeles’ *Development Best Management Practices Handbook, Low Impact Development Manual, Part B: Planning Activities* (5th edition, May 2016) (“LID Handbook”)<sup>12</sup> which 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. 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.

The City of Los Angeles implements the requirement to incorporate stormwater BMPs, including LID BMPs through the City’s plan review and approval process. During the 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.

(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)<sup>13</sup> was developed by the City’s Department of Public Works, Bureau of Sanitation, Watershed Protection Division, in collaboration with stakeholders, in response to a 2007 City Council motion for the development of a water quality master plan

<sup>12</sup> City of Los Angeles Development Best Management Practices Handbook, Low Impact Development Manual, Part B, Planning Activities, June 2011. Available at: [http://www.lastormwater.org/wp-content/files\\_mf/lidhandbookfinal62212.pdf](http://www.lastormwater.org/wp-content/files_mf/lidhandbookfinal62212.pdf). Accessed April 14, 2018.

<sup>13</sup> City of Los Angeles Department of Public Works, Water Quality Compliance Master Plan, available at: [http://www.lastormwater.org/wp-content/files\\_mf/wqcmpur.pdf](http://www.lastormwater.org/wp-content/files_mf/wqcmpur.pdf). Accessed April 14, 2018.

addressing pollution from urban runoff within Los Angeles. 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. 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) *Los Angeles Municipal Code*

(i) *Municipal Code Section 62.105, Construction "Class B" Permit*

Proposed drainage improvements within a 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 an A-permit for minor improvements and repairs or a B-permit for major improvements (Section 62.105, Municipal Code). Under the A-Permit and B-permit processes, storm drain installation plans are subject to review and approval by Bureau of Engineering. 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 Bureau of Engineering.

(ii) *Los Angeles Municipal Code - Stormwater and Urban Runoff Pollution Control Ordinance*

Section 64.70 of the LAMC sets forth the City's Stormwater and Urban Runoff Pollution Control Ordinance. The ordinance prohibits the discharge of the following into any storm drain system:

- Any liquids, solids, or gases which by reason of their nature or quantity are flammable, reactive, explosive, corrosive, or radioactive, or by interaction with other materials could result in fire, explosion or injury.
- Any solid or viscous materials, which could cause obstruction to the flow or operation of the storm drain system.
- Any pollutant that injures or constitutes a hazard to human, animal, plant, or fish life, or creates a public nuisance.
- Any noxious or malodorous liquid, gas, or solid in sufficient quantity, either singly or by interaction with other materials, which creates a public nuisance, hazard to life, or inhibits authorized entry of any person into the storm drain system.
- Any medical, infectious, toxic or hazardous material or waste.

Additionally, unless otherwise permitted by a NPDES permit, the ordinance prohibits industrial and commercial developments from discharging untreated wastewater or untreated runoff into the storm drain system. Furthermore, the ordinance prohibits trash or any other abandoned objects/materials from being deposited such that they could be carried into the storm drains. Lastly, the ordinance not only makes it a crime to discharge pollutants into the storm drain system and imposes fines on violators, but also gives city public officers the authority to issue citations or arrest business owners or residents who deliberately and knowingly dump or discharge hazardous chemicals or debris into the storm drain system.

(iii) *Municipal Code 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, 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.

(e) *Low Impact Development Ordinance (No. 181,899)*

In November 2011, the City adopted a City-wide LID Ordinance (“LID Ordinance”) that amends the City’s existing Stormwater Ordinance (Municipal Code Section Nos. 64.70.01 and 64.72, discussed above). The LID Ordinance conforms to the regulations outlined in the NPDES Permit.

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 can be used.<sup>14</sup>

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;

<sup>14</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5<sup>th</sup> Edition, May 9, 2016, [https://www.lacitysan.org/cs/groups/sg\\_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf](https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf). Accessed November 2017.



- Reduce offsite runoff and provide increased groundwater recharge;
- Reduce erosion and hydrologic impacts downstream; and
- Enhance the recreational and aesthetic values in our communities.

The City-wide 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 the BMPs contained therein comply with MS4 Permit requirements for stormwater management, the MS4 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 requires the capture and management of the greater of an 85<sup>th</sup> percentile rain event or first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs, through one or more of the City's preferred LID improvements in priority order: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible as summarized 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 micro-organisms 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 Use 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 use 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 use 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** – Landscaped facilities that capture and treat stormwater runoff through a variety of physical and biological treatment processes. Facilities 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 facilities, and bioretention facilities 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. 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 (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.

## **b) Existing Conditions**

### **(1) Surface Water Hydrology**

#### *(a) Regional*

Per the City's Drainage Map 469-3, the Project Site lies in the northern upstream portion of an approximate 35-acre local watershed<sup>15</sup> located within the nine-mile long, 130-square-mile Ballona Creek Watershed. The Ballona Creek Watershed is bounded by the Santa Monica Mountains on the north, the Harbor Freeway (US Route 110) to the east, the Baldwin Hills on the south, and the City of Santa Monica to the west. The watershed is comprised of all or portions of the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, West Hollywood, and unincorporated Los Angeles County. Stormwater that does not percolate into the ground is directed by storm drains into major tributaries including Centinela Creek, Sepulveda Canyon Channel, and Benedict Canyon Channel. The Ballona Creek Watershed generally flows southwest and eventually discharges into the Santa Monica Bay. During a 50-year storm event, the watershed is designed to discharge to Santa Monica Bay at approximately 71,400 cubic feet per second ("cfs").

#### *(b) Local*

The Project Site is located within the Underground storm drain facilities in the Project Site vicinity are owned and maintained by the City. A City-owned 24-inch storm drain runs beneath Argyle Avenue and discharges to a 90-inch storm drain in Sunset Boulevard.

<sup>15</sup> Southland Civil Engineering and Survey, LLC, Preliminary Drainage Study, July 2017, page 3 and Appendix A-1 (City Drainage Map).

Stormwater runoff from properties in the Project Site area is discharged into gutters and storm drains along Yucca Avenue, Argyle Avenue and Vista Del Mar Avenue and enters the underground storm drains through catch basins; stormwater is then conveyed through this underground network into Ballona Creek.

(c) *Project Site*

The approximate 1.16-acre Project Site is improved with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings (43 existing multi-family/apartment units total) and associated carports and paved surface parking areas. The overall Project Site is approximately 87 percent impervious, with approximately 0.151 acre (or 6,580 square feet) of the 1.16-acre site being pervious. Topography of the Project Site includes two (2) identified drainage subareas, referred to as the “westerly” and “easterly” drainage subareas.

The existing westerly drainage subarea, comprising the majority of the Project Site, includes approximately 0.90 acres and is 89 percent impervious, with buildings, a parking lot with carports, and landscaping. This westerly subarea has a vertical elevation difference of 10 feet as it slopes southwesterly to Argyle Avenue. With a horizontal distance of approximately 335 feet from the highest point to the lowest point, the average slope of the westerly subarea is 3 percent. Runoff from the westerly drainage subarea flows into the gutters along Yucca Street and Argyle Avenue. Ultimately, runoff from the westerly drainage area drains to the 24-inch, City-owned storm drain in Argyle Avenue, which then drains southerly to the 90-inch storm drain in Sunset Boulevard.

The existing easterly drainage subarea, generally located along Vista Del Mar Avenue, includes approximately 0.26 acres and is 80 percent impervious, with a parking lot, and residential units. This easterly subarea has a vertical elevation difference of approximately 8 feet as it slopes southeasterly to Vista Del Mar Avenue. With a horizontal distance of approximately 104 feet, the average slope of this existing subarea is 7 percent. Runoff from the easterly drainage subarea flows southerly along the gutter in Vista Del Mar Avenue to a storm drain located at the intersection with Carlos Avenue. From this location, runoff flows to the 24-inch, City-owned storm drain in Argyle Avenue, which then drains southerly to the 90-inch storm drain in Sunset Boulevard. Thus, ultimately, all Project Site drainage flows to the 24-inch drain in Argyle Avenue and then to the 90-inch drain in Sunset Boulevard.

According to the 2006 Los Angeles County Department of Public Works (LACDPW) Hydrology Manual (Hydrology Manual), the Project Site lies in a 50-year, 24-hour Isohyet Rainfall Zone<sup>16</sup> yielding 5.98 inches of rainfall above Altamont Clay Loam type soil (soil

<sup>16</sup> Isohyets are rainfall depths at a specific duration and frequency used to predict rainfall recurrence intervals. Source: Los Angeles County Department of Public Works, Hydrology Manual, Chapter 5, page 36, available at: [https://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](https://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf). Accessed April 14, 2018.

classification number 002). Per County criteria, the 10-year, 24-hour Isohyet Rainfall is 4.27 inches in the Project area.<sup>17</sup>

Existing runoff calculations (provided in Appendix B.2 of the *Preliminary Drainage Study*) for the currently developed Project Site result in a runoff discharge flows for a 10-year storm (Q10) of 1.88 and 0.58 cfs for the westerly and easterly drainage subareas, respectively. Runoff discharge flows during a 50-year storm (Q50) for the westerly and easterly drainage subareas are 2.89 and 0.82 cfs, respectively.

The Seismic Hazard Zone Report for the Hollywood Quadrangle indicates the historically highest groundwater level in the Project Site area is deeper than 80 feet.<sup>18</sup> During fault investigations for the Project Site in 2014, perched groundwater was encountered at depths of 27 to 36 feet below existing grade, corresponding to an elevation of 376 to 394 feet.<sup>19</sup> The bedrock appears to be a barrier for the groundwater on-site. Water was encountered within sandstone layers and pooled on top of the alluvial bedrock contact. Seasonal perched groundwater may be present on shallower less-permeable layers within the alluvium.

## (2) Surface Water Quality

### (a) Regional

The Project Site lies within the Los Angeles Basin (“Basin”) as designated by the LARWQCB. The Basin consists of the coastal areas of the County, the area south of the divide of the San Gabriel Mountains and Santa Susana Mountains, a small coastal portion of Ventura County, and the area south of the divide of the Santa Monica Mountains. The Basin is drained by seven watersheds: Ventura River, Santa Clara River, Calleguas Creek, Malibu Creek, Ballona Creek, Los Angeles River, and San Gabriel River.<sup>20</sup> Numerous tributaries discharge into these watersheds, most of which have intermittent flows. Most tributaries have been converted to flood control channels lined with concrete and stone rip-rap. The Project Site is also located within the Santa Monica Bay Watershed Management Area of the Basin, which includes Los Angeles River and Ballona Creek.

<sup>17</sup> Southland Civil Engineering & Survey, LLP, Preliminary Drainage Study for 6220 West Yucca Street Mixed Use Development, July 11, 2017 (revised), page 4. Provided in Appendix H of this Draft EIR.

<sup>18</sup> California Geological Survey, 1998, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California, Seismic Hazard Zone Report 026, Plate 1.2. Available at: [http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR\\_026\\_Hollywood.pdf](http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR_026_Hollywood.pdf). Accessed November 2017.

<sup>19</sup> Group Delta Consultants, Inc., Updated Geotechnical Feasibility Report for Proposed High-Rise Residential Development 6220 West Yucca Street, Hollywood District, Los Angeles, California (“Geotechnical Feasibility Report”), 2019. See Page 5. Provided in Appendix F-1, of this Draft EIR.

<sup>20</sup> California Regional Water Quality Control Board, Los Angeles Region (4), Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/basin\\_plan\\_documentation.shtml](http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml). Accessed November 2017.

The LARWQCB prepared a plan for the Basin (“LA Basin Plan”) to preserve and enhance the water quality and protect the beneficial uses of all designated Waters of the State within the region. The LA Basin Plan lists existing beneficial uses for Ballona Creek as non-contact water recreation and wildlife habitat.<sup>21</sup> Potential beneficial uses include warm freshwater aquatic habitat, municipal and domestic supply, and water contact recreation. Ballona Creek does not meet the water quality standards for these potential beneficial uses and is listed in the State Water Resources Control Board’s (SWRCB) 2012 Integrated Report (Clean Water Act Section 303(d) List) as an impaired waterway. The following TMDL<sup>22</sup> for the pollutants that contribute to the impairment of Ballona Creek as listed in the most recently approved 2012 303 (d) List include cadmium (sediment); coliform bacteria; copper (dissolved); cyanide; lead; selenium; toxicity; trash; enteric viruses; and zinc.<sup>23</sup> The draft 2016 303(d) List, which is still subject to approval by the State Water Board, proposed to remove cadmium and selenium from the Ballona Creek 303(d) List.<sup>24</sup>

Ballona Creek ultimately outlets in Santa Monica Bay, which is identified under the LA Basin Plan as having environmental issues related to the designated beneficial uses of seafood consumption and swimming. Regarding seafood from Santa Monica Bay, studies have shown that some local seafood species contain elevated concentrations of dichloro-diphenyl-trichloroethane (“DDT”) and polychlorinated biphenyls (“PCBs”). Regarding the safety of swimming in the Santa Monica Bay, some beaches are occasionally closed due to discharges of stormwater contaminated with insufficiently treated sewage overflows. The Clean Water Act, 2012 Section 303(d) List identifies Santa Monica Bay as impaired due to DDT (tissue and sediment), debris, fish consumption advisory, PCBs, and sediment toxicity.<sup>25</sup> The draft 2016 303(d) List, which is still subject to approval by the

<sup>21</sup> California Regional Water Quality Control Board, Los Angeles Region (4), Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/basin\\_plan\\_documentation.shtml](http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml). Accessed November 2017.

<sup>22</sup> The 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 margin of safety included).

<sup>23</sup> California Environmental Protection Agency, State Water Resources Control Board, Water Issues, Impaired Water Bodies, 2012 Integrated Report, 303(D) Listed Waters (Web-Based Interactive Map), [https://www.waterboards.ca.gov/water\\_issues/programs/tmdl/integrated2012.shtml?wbid=CAR4051300019980918142302](https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2012.shtml?wbid=CAR4051300019980918142302). Accessed November 2017.

<sup>24</sup> California Environmental Protection Agency, State Water Resources Control Board, Water Issues, Impaired Water Bodies, 2012 303(D) Impaired Water Bodies/303 (d) List, Draft 2016 Section 303(d) and 305(b) Integrated Report for Public Review. [https://www.waterboards.ca.gov/water\\_issues/programs/tmdl/integrated2012.shtml?wbid=CAR4051300019980918142302](https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2012.shtml?wbid=CAR4051300019980918142302). Accessed November 2017.

<sup>25</sup> California Environmental Protection Agency, State Water Resources Control Board, Water Issues, Impaired Water Bodies, 2012 Integrated Report, 303(D) Listed Waters (Web-Based Interactive Map), [https://www.waterboards.ca.gov/water\\_issues/programs/tmdl/integrated2010.shtml](https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml). Accessed November 2017.

State Water Board, proposed to remove sediment toxicity from the Santa Monica Bay 303(d) List, but add arsenic and mercury.<sup>26</sup>

*(b) Local*

Urban stormwater runoff generally occurs following precipitation events. The volume of runoff flowing into the regional drainage system depends on the intensity and duration of the rain event. Pollutants of concern from developed areas that have the potential to affect stormwater quality include trash, sediments, bacteria, metals, oil and grease, nutrients, organics and pesticides. The sources of contaminants include surface areas where precipitation falls, as well as the air it falls through. 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.

*(c) Project Site*

The Project Site currently lacks facilities for the treatment for stormwater runoff from existing surface parking lots and land uses. Water from existing pervious areas, such as lawns and planted beds, would naturally treat surface runoff to some extent through existing vegetation and permeable soils. As previously described, drainage from the Project Site is conveyed off-site via sheet flow into the gutters along Argyle Avenue, Yucca Avenue and Vista Del Mar Avenue, where flows traverse through the City's municipal storm drain system and ultimately into Ballona Creek and Santa Monica Bay.

According to the Phase I Environmental Site Assessment performed for the Project Site, no recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), historical recognized environmental conditions (HRECs), such as the presence of a past release of hazardous substances or petroleum products that could affect surface water quality are present on the Project Site.<sup>27</sup> In light of the age of existing onsite buildings, potential environmental issues include the potential for asbestos or lead-based paint associated with the existing buildings. However, these materials, when intact, do not affect the quality of surface water runoff. No settling ponds, water surface impoundments, natural catch basins, or other features that would retain surface water are present on the Project Site.

<sup>26</sup> California Environmental Protection Agency, State Water Resources Control Board, Water Issues, Impaired Water Bodies, 2012 303(D) Impaired Water Bodies/303 (d) List, Draft 2016 Section 303(d) and 305(b) Integrated Report for Public Review.  
[https://www.waterboards.ca.gov/water\\_issues/programs/tmdl/integrated2012.shtml?wbid=CAR4051300019980918142302](https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2012.shtml?wbid=CAR4051300019980918142302). Accessed November 2017.

<sup>27</sup> Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, November 13, 2015, page ii. Provided in Appendix B of this Draft EIR.

### (3) Groundwater Hydrology

#### (a) *Regional*

Domestic uses are a major beneficial use of groundwater in Los Angeles County. One-third of the water supply for coastal areas of Greater Los Angeles comes from local groundwater sources.<sup>28</sup> The City of Los Angeles overlies the Los Angeles Coastal Plain Groundwater Basin, which is comprised of the Hollywood, Santa Monica, Central, and West Coast Subbasins. Groundwater flow in the Los Angeles Coastal Plain is generally south-southwesterly, but may be restricted by natural features. Recharge of the Los Angeles Coastal Plain Groundwater Basin is predominantly from percolation of precipitation throughout the region via permeable surfaces, managed groundwater recharge at spreading grounds, and groundwater migration from adjacent basins, as well as from injection wells designed to pump freshwater along seawater barriers to prevent the intrusion of salt water into the Basin's freshwater groundwater basins. Groundwater levels decline and rise from year to year depending on recharge and pumping.

In 1945, when intrusion of seawater caused by declining water levels threatened the quality of the groundwater supply, legal action was taken to halt the overdraft and prevent further damage to the West Coast Basin. In 1955, the Superior Court of Los Angeles County appointed the Department of Water Resources (DWR) as the Watermaster of the Final West Coast Basin Judgement.<sup>29</sup> Similar to the Central Coast Basin, the annual Watermaster Service Report is prepared. The West Coast Judgement affirmed the City's right to produce 1,503 AFY of groundwater from this basin.<sup>30</sup>

In 2014, the West Coast Basin judgement was amended in a manner similar to the Central Basin Judgement. The new Watermaster for the West Coast Basin also consists of an Administrative Body, in which parties are able to pump unused West Coast Basin rights out of the Central Basin, per the Central Basin Judgement.<sup>31</sup>

#### (b) *Local*

The Project Site overlies the Hollywood Subbasin within the Los Angeles Coastal Plain Groundwater Basin. The subbasin consists of alluvium of silty fine to coarse sand near the surface, in which the groundwater may be perched (i.e., prevented from percolating deeper or connecting to supplies in the Subbasin due to the presence of subsurface rock formations).<sup>32</sup> According to the Phase I Environmental Site Assessment performed for the

<sup>28</sup> USGS, Saltwater Intrusion in Los Angeles Area Coastal Aquifers, available at: <https://pubs.usgs.gov/fs/2002/fs030-02/>. Accessed April 14, 2018.

<sup>29</sup> Case No, 506,806-amended judgement (UWMP, page 6-17)

<sup>30</sup> LADWP, Urban Water Management Plan, 2015, page 6-17. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>. Accessed August 23, 2019.

<sup>31</sup> Ibid.

<sup>32</sup> State of California, California's Groundwater Bulletin 118, South Coast Hydrologic Region, Coastal Plain of Los Angeles Groundwater Basin, February 27, 2004, available at: <https://www.water.ca.gov/LegacyFiles/groundwater/bulletin118/basindescriptions/4-11.04.pdf>. Accessed April 14, 2018.

Project Site, groundwater monitoring data available from the Regional Water Quality Control Board (RWQCB) GeoTracker website for a nearby site (Arco Station #1057 at 6100 Franklin Avenue) located approximately 0.2-mile northeast of the subject property, the direction of groundwater in the vicinity of the subject property is inferred to flow toward the southeast.<sup>33</sup>

(c) *Project Site*

The Seismic Hazard Zone Report for the Hollywood Quadrangle (CGS 1998) indicates that the historically highest groundwater level in the Project area is deeper than 80 feet. However, during the previous fault investigation for the Project Site in 2014, perched groundwater was encountered at depths of 27 to 36 feet below existing grade.<sup>34</sup> The bedrock appears to be a barrier for the groundwater onsite and water was encountered within sandstone layers and pooled on top of the alluvial bedrock contact. Seasonal perched groundwater may be present on shallower less-permeable layers within the alluvium.

(4) **Groundwater Quality**

(a) *Regional*

In general, due to historical activities and practices, groundwater quality in the City of Los Angeles has been substantially degraded. The degradation of regional groundwater is a result of seepage into the subsurface from the use of fertilizers and pesticides from agricultural uses, nitrogen and pathogenic bacteria from septic tanks, and various hazardous substances from leaking underground storage tanks and industrial type-operations.

Groundwater problems in the West Coast Basin were previously related to high levels of total dissolved solids (TDS), hydrocarbons, and chlorides. LADWP halted operations in the basin in 1980 with closure of Lomita Wetfield, and intends to study the feasibility and cost of restoring groundwater pumping.<sup>35</sup>

As discussed above, the Project Site is in the Hollywood Subbasin of the Coastal Plain of the Los Angeles Groundwater Basin. Specific groundwater quality information from the Subbasin is scarce since most of the public water supply is from imported surface water, and water quality was not measured on a regular basis when production wells were inactive for a 20-year period from the 1970s to the 1990s. While private wells for irrigation and industrial uses are known to exist in the subbasin, there are no available records on the current water quality. However, data is available from the City of Beverly Hills, who currently operates at least four production wells in the subbasin. The quality of the groundwater in the subbasin is generally fair and has a total dissolved solids (TDS) concentration ranging from 357 to 970 milligrams per liter (mg/L). TDS are inorganic compounds that are found in water such as salts, heavy metals and some traces of

<sup>33</sup> Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, November 13, 2015, page 6. Provided in Appendix B of this Draft EIR.

<sup>34</sup> Group Delta, Update Geotechnical Feasibility Report 6220 West Yucca Street, March 2019, page 5. Provided in Appendix F-1, of this Draft EIR.

<sup>35</sup> LADWP, Urban Water Management Plan, 2015, page 6-17 (Op. Cit.).



organic compounds that are dissolved in water. Approximately 85 percent of the samples collected at the supply wells operated by the City of Beverly Hills exceeded the secondary standard of 500 mg/L for TDS, which is the maximum concentration level for drinking water set by the US EPA.<sup>36,37</sup>

(b) *Local*

The Phase I Environmental Site Assessment performed for the Project Site indicated that no domestic water wells are located within the area surrounding the Project Site. However, several monitoring wells associated with discharges from USTS, dry cleaners and other commercial or industrial uses are maintained on properties within the broader vicinity of the Project Site within the Hollywood Community Plan area.

(c) *Project Site*

Based on the analysis of available records, the shallow groundwater beneath the subject property is not utilized for domestic purposes.<sup>38</sup> No wells, drywells, or cisterns are currently located within the Project Site. Because hazardous conditions such as underground storage tanks or spills of hazardous materials or petro-chemicals have not been identified on the Project Site, no existing adverse conditions regarding groundwater quality are anticipated.

## (5) Flood Zone

The Project Site is mapped by the Federal Emergency Management Agency (FEMA) as located within Zone X, an area determined to be outside the 0.2 percent Annual Change Flood Hazard Zone. The site is not located in a 100-year or 500-year flood zone as delineated by the City. The Project Site is located approximately 1.5 miles downhill of the Hollywood Reservoir and within the reservoir inundation zone. The Hollywood Reservoir is operated and maintained by LADWP. Given the distance between the dam and the Project, Project implementation would not be adversely affect the structural integrity of the Hollywood Reservoir Dam.

Measures to maintain the safety of the dam in accordance with dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams provides periodic review of all dams in the State; and dams and reservoirs are monitored by the City during storms. Measures are instituted in the event of potential overflow. According to the City's Safety Element, the City is reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure by monitoring dams and reservoirs during storms

<sup>36</sup> US EPA website: <https://www.epa.gov/dwstandardsregulations/secondary-drinking-water-standards-guidance-nuisance-chemicals>, accessed October 20, 2018.

<sup>37</sup> City of Beverly Hills, 2010 Urban Water Management Plan, August 2011.

<sup>38</sup> Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, November 13, 2015, page 5. Provided in Appendix B of this Draft EIR.

and instituting measures in the event of potential overflow.<sup>39</sup> Mitigation of potential seiche hazards is implemented by the LADWP through regulation of the level of water in its storage facilities and the provision of walls of extra height to contain seiches and prevent overflow or inundation. 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.

### 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 hydrology and water quality if it would:

***Threshold (a): Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;***

***Threshold (b): Substantially decrease groundwater supplies or interfere substantially with groundwater recharge 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 off-site;***

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

***iv. Impede or redirect flood flows;***

***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 control plan or sustainable groundwater management.***

<sup>39</sup> City of Los Angeles General Plan Safety Element, available at: [https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\\_Element.pdf](https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf). Accessed April 14, 2018.

In assessing the Project's potential impacts related to hydrology and water quality in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G questions:

(a) *Surface Water Quality*

- Result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (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.

(b) *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.

(c) *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.

## **b) Methodology**

The analysis in this section addresses the Project's potential impacts on hydrology (drainage), surface water quality, and groundwater levels/quality. The analysis is based, in part, on the *Preliminary Drainage Study* (July 2017) prepared for the Project which is included as Appendix H to this Draft EIR. The *Preliminary Drainage Study* incorporates the methodologies specified by the LACDWP, including the Hydrology Manual,<sup>40</sup> and the City of Los Angeles Department of Public Works and Bureau of Engineering guidelines, including the Bureau of Engineering Manual Part G – Storm Drain Design.<sup>41</sup>

<sup>40</sup> Los Angeles County Department of Public Works, Hydrology Manual, 2006, available at: [https://dpw.lacounty.gov/wrd/publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](https://dpw.lacounty.gov/wrd/publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf). Accessed April 14, 2018.

<sup>41</sup> City of Los Angeles Bureau of Engineering, Engineering Manual Part G- Storm Drain Design, available at: <http://eng2.lacity.org/techdocs/stormdr/>. Accessed April 14, 2018

### (1) Water Quality

Water quality impacts were assessed by considering the types of pollutants and effects on water quality likely to be associated with construction and operation of the Project, and expected potential contaminant flows with Project implementation. Project consistency with relevant regulatory requirements is evaluated to demonstrate how compliance would reduce potential Project impacts.

### (2) Hydrology

The analysis of hydrology impacts includes a calculation of pre-Project and post-Project surface water runoff rates during a 10- and 50-year storm event. Potential impacts to the storm drain system were analyzed by comparing the calculated pre-Project runoff rates to the calculated post-Project surface water runoff rates to determine the Project's effect on drainage flows. The Project's potential on-site systems for collecting, treating and reclaiming stormwater are described and reviewed for consistency with applicable regulatory measures for reducing off-site flooding and erosion impacts, as well as impact to existing stormwater drainage systems. For additional detail regarding the analyses of the change in surface runoff patterns and quality associated with development of the Project and the impact of these changes on the existing downstream stormwater system, please see the *Preliminary Drainage Study*.

### (3) Groundwater

The evaluation of groundwater impacts is based on studies describing historic groundwater levels and conditions in the area and on the Project Site. The determination of impact is based on whether perched conditions, in which the groundwater is disconnected from the area's water table and groundwater flow, occur and whether the Project's subterranean structures would intercept the estimated groundwater resource. Research is based on the Updated Geotechnical Feasibility Report prepared for the Project Site and other public information.<sup>42</sup> Interception of any underlying perched water (localized pockets of water) would not result in contamination of regional or local groundwater supplies because of their discontinuity with the groundwater table.

## c) Project Design Features

There are no Project Design Features that relate to hydrology and water quality.

<sup>42</sup> Group Delta Consultants, Inc., Updated Geotechnical Feasibility Report for Proposed High-Rise Residential Development 6220 West Yucca Street, Hollywood District, Los Angeles, California ("Geotechnical Feasibility Report"), March 2019. Provided in Appendix -F1, of this Draft EIR.

## d) Analysis of Project Impacts

***Threshold (a): Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

### (1) Construction

#### (a) Surface Water

The Waters of the State applicable to the Project that Water Quality Standards and Waste Discharge Requirements are created to protect are Ballona Creek, its relevant tributaries and Santa Monica Bay. Construction activities associated with the construction of the Project such as earth moving, maintenance and operation of construction equipment, and handling, storage, and disposal of materials could contribute to pollutant loading into Water of the State via stormwater runoff into the MS4 system, ultimately leading to protected waters. Non-stormwater discharges, such as from washing equipment and watering for dust control, are other potential sources of contaminant discharges from the Project Site into the MS4. Construction contractors disturbing more than one acre of soil are required to obtain coverage under the NPDES General Construction Activity Permit (SWRCB Order No. 2009-0009-DWQ) which would constitute the applicable Waste Discharge Requirements for Project construction. In accordance with the Waste Discharge Requirements of the permit, the Applicant would be required to prepare and implement a site-specific SWPPP that would specify the BMPs to be used during Project construction. The BMPs would include, but not be limited to, erosion control, sediment control, and non-stormwater management and materials management BMPs. In compliance with this regulatory requirement, BMPs would be implemented to control erosion and to reduce or eliminate discharges and otherwise protect the quality of storm water and non-storm water runoff during the construction by controlling the discharge of potential contaminants incident to the construction process, such as, as potential examples, petroleum products, paints and solvents. The SWPPP would be subject to the enforcement authority of the Los Angeles Regional Water Quality Control Board and also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A, Construction Activities.<sup>43</sup> With implementation of these BMPs, the discharge of pollutants in stormwater runoff would be reduced or eliminated during Project construction, consistent with said applicable regulatory requirements.

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 1st to April 14th), a wet weather erosion control plan

<sup>43</sup> City of Los Angeles, Best Management Practices Handbook, Part A, available at: [http://www.lastormwater.org/wp-content/files\\_mf/parta.pdf](http://www.lastormwater.org/wp-content/files_mf/parta.pdf). Accessed April 14, 2018

would be prepared pursuant to the “Manual and Guideline for Temporary and Emergency Erosion Control,” adopted by the 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.

Through compliance with NPDES Waste Discharge Requirements, including preparation and implementation of a SWPPP in compliance with the general construction permit, and compliance with the City’s grading regulations, construction of the Project would control stormwater pollutant discharges in a manner that would not cause: (1) a violation of an applicable water quality standard in receiving waters defined as Waters of the State (i.e., Ballona Creek and Santa Monica Bay). Additionally, with regulatory compliance, the Project would not result in contamination of Waters of the State to a degree that would create a hazard to the public health through poisoning or through the spread of diseases or a nuisance that would be injurious to health, or affect an entire community, neighborhood, or any considerable number of persons, or occur as a result of the treatment or disposal of wastes. **Accordingly, with its required compliance with applicable Waste Discharge Requirements, Project construction-related impacts would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. The Project’s construction-related impacts to surface water quality would be less than significant.**

(b) *Groundwater*

The Seismic Hazard Zone Report for the Hollywood Quadrangle indicates the historically highest groundwater level in the area is deeper than 80 feet below existing grade.<sup>44</sup> During fault investigations for the Project Site in 2014, perched groundwater was encountered at depths of 27 to 36 feet below existing grade, corresponding to an elevation of 376 to 394 feet.<sup>45</sup> The bedrock below the Project Site (below the perched groundwater) appears to be a barrier for the groundwater on-site and, thus, creates the perched condition. The perched condition was confirmed by water encountered within sandstone layers and pooled on top of the alluvial bedrock contact below the depth of 27 to 36 feet. Seasonal perched groundwater may be present on shallower less-permeable layers within the alluvium.<sup>46</sup>

<sup>44</sup> California Geological Survey, 1998, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California, Seismic Hazard Zone Report 026, Plate 1.2, available at: <https://planning.lacity.org/eir/ConventionCntr/DEIR/files/references/California%20Division%20of%20Mineral%20and%20Geology,%20%20Hollywood%20Quadrangle,%201998.pdf>. Accessed April, 16, 2018.

<sup>45</sup> Update Geotechnical Feasibility Report for Proposed High-Rise Residential Development 6220 West Yucca Street, Hollywood District, Los Angeles, California (“Geotechnical Feasibility Report”), prepared by Group Delta Consultants, Inc., March 2019, and provided in Appendix F-1, of this Draft EIR. See page 5.

<sup>46</sup> Group Delta Consultants, Inc., Updated Geotechnical Feasibility Report for Proposed High-Rise Residential Development 6220 West Yucca Street, Hollywood District, Los Angeles, California (“Geotechnical Feasibility Report”), March 2019. See Page 5. Provided in Appendix F-1, of this Draft EIR.

The Project Site ground level descends from 430 feet above sea level at the northeast corner of the site down to about 408 feet above sea level at the southwest portion of the site. The Project's lowest basement level is estimated to be an elevation of 408 feet, which would be above the encountered groundwater potentially occurring at 376 to 394 above sea level. Although not anticipated, if groundwater were encountered closer to the ground's surface such that it would be encountered during construction, dewatering would be required. Dewatering, treatment, and disposal of groundwater 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*.<sup>47</sup> Implementation of the BMPs in the SWPPP (under the General Construction Permit) in accordance with LARWQCB's discharge requirements would further ensure that any dewatering and discharge of groundwater during construction would not impact groundwater quality. In addition, any on-site groundwater resources that would be encountered during Project construction would occur in a perched condition that would be hydrologically disconnected from the area's primary groundwater basin. **With required compliance with applicable Waste Discharge Requirements, the Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. Project's construction-related impacts to groundwater quality would be less than significant.**

## (2) Operation

### (a) Surface Water

Stormwater runoff from the Project Site has the potential to introduce pollutants into the municipal storm drain system leading to Waters of the State. Runoff from urban sites generally, and the runoff that would be expected from this Project Site in particular, have the potential to contain pollutants that could include, for some potential examples, nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, and trash and debris, among others.

However, during operation, the Project would be required to incorporate BMPs and LID features to capture and treat the Project Site's runoff per the applicable provisions of City's LID Ordinance.<sup>48</sup>

In accordance with these requirements, the Project would be designed such that rainfall landing on the rooftop landscaped areas would be directed towards and collected by catch basin inlets and down drain outlets, which would discharge directly into the City's offsite drainage system. The collection of rainfall and discharge into the existing City system would

<sup>47</sup> Los Angeles Regional Water Quality Control Board, LARWQCB Basin Plan, [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/](http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/). Accessed April 16, 2018.

<sup>48</sup> City of Los Angeles Development Best Management Practices Handbook, Low Impact Development Manual, Part B, Planning Activities, June 2011. Available at: [http://www.lastormwater.org/wp-content/files\\_mf/lidhandbookfinal62212.pdf](http://www.lastormwater.org/wp-content/files_mf/lidhandbookfinal62212.pdf). Accessed April 14, 2018.

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.

Per the LID requirements, as determined by the City of Los Angeles Department of Public Works, Bureau of Sanitation, the Project would include one or more of the following BMPs to treat a “first flush” volume of runoff equal to the greater of an 85th Percentile 24-hour or 0.75-inch rainfall event (in priority order to the maximum extent feasible):

- Infiltration basins or trenches
- Rainwater harvesting cisterns for irrigation reuse
- Biofiltration via planter boxes, basins, or proprietary treatment devices<sup>49</sup>

Infiltration BMPs must be located at suitable distances from buildings, slopes, property lines, and seasonal high groundwater levels. Infiltration BMPs must also be located in suitable soils with high permeability rates that are not subject to hazards such as liquefaction or expansion.<sup>50</sup> However, in accordance with the LID Ordinance, the analysis required at final engineering will determine the feasibility of infiltration at the Project Site.

The potential to harvest runoff for irrigation reuse requires enough water demand to use the captured runoff volume over a certain period of time. As the Project would incorporate low-water use plantings, it must provide enough planting area to create a total water demand volume that is greater than or equal to the captured runoff volume. Therefore, the extent to which a capture and use LID solution would be considered to be a suitable BMP for the Project would be determined based on the Project’s final approved landscape plan.

It is anticipated that LID planters/biofiltration would be utilized by the Project. As explained above, biofilters are landscaped facilities that capture and treat storm water runoff through a variety of physical and biological treatment processes. Runoff is treated and detained without allowing seepage to the underlying soil. Solid particles are trapped in filter inserts and down spout filters. Potential pollutants are further removed as the runoff passes through the soil layer, to be collected and conveyed to the City drainage system. Rainfall landing on the Project Site’s hardscape surfaces would be collected via drain spouts and/or designed surface flows and flow via gravity to LID planters/biofilters located along the perimeters of the Project Site within the proposed landscaped areas as shown in Appendix A.5 of the *Preliminary Drainage Study*. Biofilters would be sized with a total proportional treatment area of approximately 7 percent of each impervious tributary drainage subarea based on preliminary calculations. Additionally, as the Project proposes separate roof decks, “green roof” designs may be considered as part of the overall LID solution.

<sup>49</sup> City of Los Angeles Development Best Management Practices Handbook, Low Impact Development Manual, Part B, Planning Activities, June 2011. Available at: [http://www.lastormwater.org/wp-content/files\\_mf/lidhandbookfinal62212.pdf](http://www.lastormwater.org/wp-content/files_mf/lidhandbookfinal62212.pdf). Accessed April 14, 2018.

<sup>50</sup> Southland Civil Engineering and Survey, LLC, Preliminary Drainage Study, July 2017, page 12.



Potentially, after the first flush (initial flow) has been filtered and pumped to a biofilter system, flows could be conveyed to underground cisterns/water storage tanks for additional water treatment and harvesting. The ultimate design of the Project's LID system would be finalized as part of the grading and building permit plan check process.

Regardless of whether the final design entails the use of biofilters, rainwater harvesting and/or infiltration, or other appropriate BMPs the Project's drainage system would be designed to meet regulatory requirements and provide treatment over the entirety Project Site of a first flush discharge to the maximum extent feasible, but for at least the amount of storm water flow from the 85<sup>th</sup> percentile rain event, or 0.75 inches of storm water (whichever is greater).<sup>51</sup>

The stormwater BMPs required to address water quality in the stormwater runoff from the Project Site would be incorporated into the design of the Project as outlined in the LID Handbook, Part B. The BMPs would include source control and treatment control BMPs. Source control BMPs would be used to prevent pollutants from entering into stormwater discharge and may include effective site design and landscape planning; storm drain signage; properly managed storage areas, loading docks, and trash storage areas; and proper maintenance of structural and treatment control BMPs. Treatment control BMPs remove pollutants from stormwater discharges, which would be consistent with the LID BMPs described above.

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 violating 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.

The Project Site currently has no means of capture or treatment for stormwater runoff. As previously described, drainage from the Project Site is conveyed off-site via sheet flow into the gutters along Argyle Avenue, Yucca Avenue and Vista Del Mar Avenue, where flows traverse through the City's municipal storm drain system and ultimately into Ballona Creek and Santa Monica Bay. Therefore, with the implementation of LID BMPs and compliance with applicable regulatory requirements that would result in the

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<sup>51</sup> City of Los Angeles Development Best Management Practices Handbook, Low Impact Development Manual, Part B and Southland Civil Engineering and Survey, LLC, Preliminary Drainage Study, July 2017, page 12.

implementation of storm water BMPs that must meet the applicable regulatory requirements, the Project would result in a net reduction of pollutant discharges as compared to existing conditions. As such, and with compliance with regulatory compliance measures, the operation of the Project would not result in discharges that would result in a violation of a Water Quality Standards in Waters of the State (i.e., Ballona Creek or Santa Monica Bay). For the same reasons, the Project would also not result in contamination of the quality of the waters of the State to a degree that would create a hazard to the public health through poisoning or through the spread of diseases or a nuisance that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons, or occur during or as a result of the treatment or disposal of wastes. The Project is rather anticipated to improve water quality from current conditions with implementation of the LID BMPs. **Therefore, with compliance with LID requirements, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. Therefore, the Project's operational impacts with respect to surface water quality would be less than significant.**

(b) *Groundwater*

The Project Site ground level descends from 430 feet above sea level at the northeast corner of the site down to about 408 feet above sea level at the southwest portion of the site. As stated above, the historically highest groundwater level in the Project Site area is deeper than 80 feet.<sup>52</sup> During fault investigations for the Project Site in 2014, perched groundwater was encountered at depths of 27 to 36 feet below existing grade, corresponding to an elevation of 394 to 376 feet above sea level.<sup>53</sup> Because the Project's lowest basement level is estimated to be approximately at an elevation of 408 feet, direct contact with the groundwater is not anticipated. The Project would generally operate as an impermeable surface within the building footprints and hardscaped areas. A small amount of rainwater or irrigation water may percolate into the soils below the Project's ground level landscaped spaces, however, the amount of such water would be negligible. Source control measures under the City's LID, including good housekeeping, such as removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce 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 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 accordance with applicable standards and regulations such that no hazardous materials would be exposed to or otherwise would adversely impact groundwater. Also,

<sup>52</sup> California Geological Survey, 1998, Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California, Seismic Hazard Zone Report 026, Plate 1.2.

<sup>53</sup> Update Geotechnical Feasibility Report for Proposed High-Rise Residential Development 6220 West Yucca Street, Hollywood District, Los Angeles, California ("Geotechnical Feasibility Report"), prepared by Group Delta Consultants, Inc., March 2019, and provided in Appendix F-1, of this Draft EIR. See page 5.

within the ground-level landscaped areas, water absorbed by landscaping would largely be reclaimed for reuse and/or discharged into the public storm drain system as a function of LID Ordinance-compliant BMPs. Therefore, the Project would not adversely affect the groundwater table below the Project Site. **With implementation of LID requirements, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality., the operation of the Project would have a less than significant impact with respect to groundwater quality.**

(c) *Summary*

**Project construction and operation would be consistent with water quality standards, including but not limited to NPDES permits/ Waste Discharge Requirements and the City's LID ordinance and, as such, would not substantially degrade surface or groundwater quality. Impacts with respect to surface and groundwater quality would be less than significant.**

***Threshold (b): Would the project substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

As discussed in Chapter VI (subsection Impacts Found not to be Significant of this Draft EIR) and in the Initial Study (Appendix A of this Draft EIR), the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. The Project would result in a less than significant impact with respect to Threshold b. No further analysis is required.

***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 off-site;***
- iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
- iv. impede or redirect flood flows?***

### (3) Construction

#### (a) *Erosion or Siltation*

No stream or river is located on or adjacent to the Project Site or other natural drainage that would be affected by the Project. However, construction of the Project would temporarily alter the existing flow patterns of the Project Site, particularly during excavation and grading activities. If a precipitation event were to occur during these activities, there is the potential for exposed sediments, which are defined as a pollutant in the applicable Basin Plan, and other potential contaminants associated with construction activities such as fuels, oils, and cleaning materials, to be carried off-site and into the local storm drain system. Uncontrolled runoff could potentially alter drainage patterns in the area, but would not affect off-site natural streams or rivers. However, as discussed above, the Project would be required to comply with the general construction storm water NPDES permit, which would mandate the preparation of a SWPPP that includes BMPs to minimize erosion and sedimentation and prevent uncontrolled storm water runoff from the Site during construction. The SWPPP would be subject to review by the Regional Water Quality Control Board and LADBS for compliance with existing regulations. As required under the SWPPP, the Applicant would identify sensitive infiltration areas and the potential for redirected runoff, and would recommend BMPs to effectively control runoff direction, infiltration and discharges. The BMPs to effectively control erosion would be selected and implemented based on the phase of construction and the weather conditions, e.g., additional BMPs are required during the rainy season. In addition to other measures, compliance with the SWPPP would require ongoing BMP maintenance of any structural BMPs. The standard BMPs to be implemented during construction include the use of impermeable sheeting during storm events and sandbags throughout construction to prevent infiltration and discharges, and the installation of berms or trenches to divert and control runoff direction into sediment basins where storm water could be retained onsite and either recycled, evaporated off, or properly disposed of under the requirements of the permit. 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. Therefore, with preparation of a SWPPP and implementation of the associated BMPs, and compliance with applicable City grading regulations, the Project would not alter the existing drainage pattern or increase the rate and amount of surface runoff in a manner that would result in substantial siltation or erosion or on- or off-site flooding. **As such, the Project's construction-related impacts with respect to substantial erosion or siltation would be less than significant.**

*(b) Increase in Rate or Amount of Surface Runoff*

Erosion control measures required under the Project's mandated SWPPP and BMPs would control surface runoff and prevent uncontrolled storm water runoff from the Site during Project construction. In addition, water used for dust control would not be applied in quantities that would form surface runoff. No other construction activities would require an increase in the use of water that would result in increased surface runoff. **As such, the Project's construction-related impacts with respect to rate and amount of surface runoff would be less than significant.**

*(c) Increase Surface Runoff Exceeding Drainage Systems or Generating Additional Sources of Pollution*

The volume and quality of surface runoff would be controlled by BMPs as required under the SWPPP, and no construction processes would require excessive use of water that would generate greater surface flow from the Project Site than under existing conditions. BMPs would also require the containment and removal of any polluted surface water. Therefore, construction activities would not generate an increase in surface water runoff that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or introduce substantial additional sources of polluted runoff. **Construction-related impacts with respect to drainage capacities or pollution would be less than significant.**

*(d) Flood Flow Impediment or Redirection*

The Project Site is located within Zone X, an area determined to be outside the 0.2 percent Annual Change Flood Hazard Zone.<sup>54</sup> In addition, the Project site is not located within a 100-year or 500-year flood zone as delineated by the City<sup>55</sup> and flood flows across the Project Site are not anticipated. In addition, the Project Site is currently developed with structures, which do not allow the free flow of water from off-site sources across the Project Site. The demolition of existing development and construction of the Project would not change the direction of any surface flow from off-site sources or cause a new impediment any flood flow from off-site sources. In addition, construction BMPs would prevent any water from off-site sources from freely flowing into or across the Project Site. **With the implementation of BMPs under the SWPPP, the demolition and construction of the Project is not anticipated to change the direction of flow of, or impede, any floodwater from off-site sources. Impacts with respect to impediment or redirection of flood flow would be less than significant.**

<sup>54</sup> FEMA Mapping Information Platform January 2013. FEMA <https://hazards.fema.gov>. Accessed June 2015.

<sup>55</sup> City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit F – 100-Year & 500-Year Flood Plains in the City of Los Angeles.

## (4) Operation

### (a) *Erosion or Siltation*

As described above, the existing overall Project Site is approximately 87 percent impervious surfaces with approximately 6,580 square feet of pervious areas. The existing runoff calculations (provided in Appendix B.2 of the *Preliminary Drainage Study*) for the currently developed Project Site result in runoff discharge flows for a 10-year storm (Q10) of 1.88 and 0.58 cfs for the westerly and easterly drainage subareas, respectively. Runoff discharge flows during a 50-year storm (Q50) for the westerly and easterly drainage subareas are 2.89 and 0.82 cfs, respectively.

Under the Project, there would be approximately 3,210 square feet landscaping/pervious areas at-grade resulting in approximately 94 percent imperviousness for the Project Site. The slopes of the on-site drainage facilities would meet the minimums per City Building Code requirements. Drainage of the Project Site would be split into two (2) subareas in order to create drainage patterns that mimic the existing drainage patterns, as described below.

The proposed westerly drainage subarea would be approximately 0.90 acres and developed with buildings containing roof decks. The westerly subarea would be considered to be 100 percent impervious, with a maximum flow path of 390 feet in length at a 2 percent slope. The proposed easterly drainage subarea would be approximately 0.26 acres; a portion of the area would be developed with the proposed building structure(s), but would also contain pervious areas at-grade. The easterly subarea would be considered to be approximately 73 percent impervious, with a maximum flow path of 200 feet in length at a 2 percent slope.

The runoff calculations (provided in Appendix B.3 of the *Preliminary Drainage Study*) for the Project Site as developed with the Project result in runoff discharge flows for a 10-year storm (Q10) of 1.76 and 0.58 cfs for the westerly and easterly drainage subareas, respectively. The runoff discharge flows during a 50-year storm (Q50) for the westerly and easterly drainage subareas would be 2.89 and 0.82 cfs, respectively.

Thus, despite the change in the impervious area, the total Project Site would have an effective change in Q10 runoff of -0.12 cfs, and effective change in Q50 runoff of 0 cfs. The Project Site lies in the northern upstream portion of an approximate 35-acre local watershed per the City's Drainage Map 469-3.<sup>56</sup> Since the Project Site is located at the most upstream portion of the local watershed (drainage area), there are no upstream areas that drain toward the Project Site that could adversely impact the Project. Also, since the Project effectively would not increase runoff flows from the Project Site, the Project would not have an adverse effect on any downstream drainage or stormwater facilities. Further, as discussed above under Threshold a, LID BMPs would be

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<sup>56</sup> Southland Civil Engineering and Survey, LLC, Preliminary Drainage Study, July 2017, Appendix A-1 (City Drainage Map).

implemented throughout the operational life of the Project to ensure that, at a minimum, no increase in flows would result from Project development compared to existing conditions. The LID Ordinance requires the capture and management of the greater of an 85th percentile rain event or first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs, through one or more of the City's preferred LID improvements in priority order: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible. The LID BMPs anticipated for the Project include biofiltration, rainwater harvesting, with infiltration to be determined (although not anticipated). Therefore, compliance with regulatory requirements would ensure that the Project would not alter the existing drainage pattern or increase the rate and amount of surface runoff in a manner that would result in substantial siltation or erosion or on- or off-site flooding. **As such, the Project's impacts with respect to substantial erosion or siltation during Project operation would be less than significant.**

(b) *Increase in Rate or Amount of Surface Runoff Resulting in Flooding*

LID BMPs would be implemented throughout the operational life of the Project to ensure that no increase in flows would result from Project development compared to existing conditions. **As such, the Project would not result in flooding on- or off-site. Impacts with respect to rate and amount of surface runoff would be less than significant.**

(c) *Increase in Surface Runoff Exceeding Drainage Systems or Contributing Additional Sources of Pollution*

The total Project Site would have an effective change in Q10 runoff of -0.12 cfs, and an effective change in Q50 runoff of 0 cfs. The LID Ordinance requires the capture and management of the greater of an 85th percentile rain event or first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs, through one or more of the City's preferred LID improvements in priority order: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible. Since the Project Site is located at the most upstream portion of the local watershed, there are no upstream areas draining toward the Project Site that could adversely impact the Project. Also, since the Project effectively would not increase runoff flows, it would not have an adverse effect on any downstream drainage or stormwater facilities compared to existing conditions. Further, as discussed above under Threshold a, LID BMPs would be implemented throughout the operational life of the Project to ensure that, at a minimum, no increase in flows would result from Project development as compared to existing conditions. Furthermore, as discussed under Threshold a, surface water quality impacts would be less than significant during construction and operation of the Project. **As such, the Project's impacts with respect to water runoff water relative to pollutant levels and the capacity of existing or planned stormwater drainage systems would be less than significant.**

*(d) Flood Flow Impediment or Redirection*

The Project Site is located within Zone X, an area determined to be outside the 0.2percent Annual Change Flood Hazard Zone and is not located within a 100-year or 500-year flood zone as delineated by the City. The Project Site also is located at a high point of the local watershed and no flood flows across the Project Site are anticipated. The Project would not change the direction of any surface flow from off-site sources or cause a new impediment any flood flow from off-site sources compared to existing conditions. **As such, the Project is not anticipated to change the direction of flow or impede any floodwater from off-site sources. Impacts with respect to impediment or redirection of flood flow would be less than significant.**

***Threshold (d): In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?***

As discussed in Chapter VI (subsection Impacts Found not to be Significant of this Draft EIR) and in the Initial Study (Appendix A of this Draft EIR), the Project would not be subject to significant hazards associated with inundation by seiche, tsunami, or flood waters and, therefore, a less than significant impact would occur with respect to Threshold d. No further analysis is required.

***Threshold (e): Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

LARWQCB's Basin Plan establishes water quality standards for the beneficial uses of the region's surface and sustainability of groundwater resources. In addition, the Ballona Creek Watershed Management Master Plan sets forth a strategy to develop pollution control and to achieve an ecologically healthy watershed. During construction, the Project would implement a SWPPP and respective construction BMPs to ensure the containment of surface water runoff and pollution. During operation, the Project would comply with the City's LID BMPs for the control of surface water runoff and water quality. LID BMPs anticipated for the Project include biofiltration, rainwater harvesting, with infiltration to be determined (although not anticipated). With compliance with SWPPP and LID regulations, the Project would not degrade the quality of surface or groundwater and, as such, the Project would be consistent with the objectives of these water quality control and groundwater management plans. **Therefore, the Project would not conflict with or obstruct implementation of these a water quality control plan or sustainable groundwater management plan.**

**e) Cumulative Impacts**

As identified in Chapter III, *General Description of Environmental Setting*, of this Draft EIR, there are 137 related projects within the vicinity of the Project Site. These projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and water quality. However, as with the Project, the related projects are located within the highly



urbanized portion 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. LADPW 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. 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. **Thus, the Project's contribution to cumulative hydrology impacts would not be cumulatively considerable. As such, cumulative impacts regarding hydrology 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, like the Project, all new construction would be subject to NPDES permit Waste Discharge Requirements for both construction, and, where applicable, to 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: 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 water contamination.

In cases where the related projects would require dewatering during excavation, dewatering, treatment and disposal of groundwater 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 would avoid adverse effects on surface water, as well as groundwater quality. Accordingly, the related projects are not anticipated to result in cumulatively considerable impacts with respect to water quality.

**Because the Project would not contribute to any significant contamination of surface or groundwater, the Project's contribution to cumulative water quality impacts would not be cumulatively considerable. As such, the Project's cumulative impacts regarding water quality would be less than significant.**

**f) Mitigation Measures**

Project impacts regarding hydrology and water quality would be less than significant. Therefore, no mitigation measures are required.

**g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to hydrology and water quality would be less than significant without mitigation.

# IV. Environmental Impact Analysis

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## 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 ordinances, plans, laws, regulations, and policies.

In addition to the analysis in this section, Section IV.A, *Aesthetics*, of this Draft EIR addresses policies and regulations related to the visual environment; Section IV.B, *Air Quality*, of this Draft EIR addresses the Project's consistency with relevant air quality plans and policies; Section IV.C, *Cultural Resources*, discusses the Vista Del Mar Avenue/Carlos Historic District; Section IV.J, *Population and Housing*, addresses the Project's consistency with growth projections and planned development capacity; Section IV.K.4, *Parks and Recreation*, addresses the Project's consistency with regulations regarding open space and park requirements; Section IV.L, *Transportation*, discusses traffic, mobility and pedestrian access; and Chapter VI, *Other CEQA Considerations*, addresses issues pertaining to growth inducement.

### 2. Environmental Setting

#### a) Regulatory Framework

##### (1) State of California

##### (a) *Ellis Act*

Pursuant to the Ellis Act, California Government Code sections 7060 et seq., when residential rental units are subject to local rent stabilization laws, a local government may require landlords to provide such tenants with 120-day notice, or one-year notice if the tenants have lived in the accommodations for at least one year and are more than 62 years of age or disabled, when such rental units are to be withdrawn from the rental market. The Ellis Act further permits local governments to impose other restrictions, conditions and requirements when protected residential rental units are being withdrawn from the market.

## (2) Regional

### (a) *Southern California Association of Governments*

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.<sup>1</sup>

As part of its planning obligations, SCAG prepares the Regional Comprehensive Plans (RCP), the most recent of which was released February 9, 2009 (2008 RCP). SCAG prepared the 2008 RCP in response to SCAG’s Regional Council directive in SCAG’s 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that may be voluntarily used by local jurisdictions when developing local plans and addressing local issues of regional significance. The RCP addresses issues related to future growth and provides a means for assessing the potential impact of individual development projects within a regional context. SCAG recommends local governments consider the RCP’s recommendations in the preparation of General Plan updates, municipal code amendments, design guidelines, incentive programs and other actions. The RCP is also closely linked to, and serves as a basis for the preparation of SCAG’s Regional Transportation Plan.<sup>2</sup>

The Project’s consistency with applicable goals and policies of the RCP is analyzed in Subsection 3(d), Analysis of Project Impacts, below.

On April 7, 2016, SCAG’s Regional Council adopted the 2016 - 2040 Regional Transportation Plan – Sustainable Communities Strategy (2016 RTP/SCS). The 2016 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. Also, the 2016 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 RTP/SCS projections.) The 2016 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

<sup>1</sup> California Council of Governments (CALCOG) website. Available at: <https://www.calcog.org/index.php?src=directory&view=members&srctype=detail&back=members&refno=51>. Accessed August 23, 2019.

<sup>2</sup> Southern California Association of Governments (SCAG). Regional Comprehensive Plan, 2008. Available at: [https://www.scag.ca.gov/Documents/f2008RCP\\_ExecSum.pdf](https://www.scag.ca.gov/Documents/f2008RCP_ExecSum.pdf). Accessed August 23, 2019.

growth patterns that complement the state and region's transportation investments, and security of the regional transportation system. Exhibit 5.1 of the 2016 RTP/SCS identifies the Project Site as a High Quality Transit Area (HQTAs), which are defined as generally walkable transit villages or corridors that are within a half mile of a well-served transit stop or a transit corridor that within 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.<sup>3</sup>

The Project's consistency with applicable goals of the 2016 RTP/SCS is analyzed in Subsection 3(d), Analysis of Project Impacts, below, and in Sections IV.B, *Air Quality*, IV.D, *Energy*, and IV.F, *Greenhouse Gas Emissions*, of this Draft EIR.

(b) *Air Quality Management Plan*

The Air Quality Management Plan (AQMP) of the South Coast Air Quality Management District (SCAQMD) 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. The 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. Additional discussion of the current AQMP, and Project consistency with the AQMP, appear in Section IV.B, *Air Quality*, of this Draft EIR.

(c) *California Air Resources Board Air Quality and Land Use Handbook*

The California Air Resources Board (CARB) published the Air Quality and Land Use Handbook in April 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit toxic air contaminant (TAC) emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the Air Quality and Land Use Handbook is to serve as a guide to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors

<sup>3</sup> SCAG. Southern California Association of Governments. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Available at: <http://scagrtppscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed August 23, 2019.

within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of dry cleaning operations with two or more machines.<sup>4</sup> The CARB Air Quality and Land Use Handbook is discussed in detail in Section IV.B, *Air Quality*, of this Draft EIR.

### (3) Local

At the local level, several plans, policies, and regulatory documents guide development within the City of Los Angeles (City), including the City of Los Angeles General Plan (General Plan) and the Los Angeles Municipal Code (LAMC), which governs land use through specific development and design standards and building and safety codes. The Project Site is also located within the Hollywood Community Plan (Community Plan) area of the City. Applicable plans and associated regulatory documents/requirements are described below.

#### (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 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 elements addressing Air Quality, which is described in Section IV.B, *Air Quality*; Service Systems/Public Recreation, Health and Wellness Element (Plan for a Healthy Los Angeles) as well as the Citywide General Plan Framework Element.<sup>5</sup> The Land Use Element is comprised of 35 Community Plans that guide land use at the local level.

#### (b) *City of Los Angeles General Plan Framework*

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan. The General Plan Framework 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, transportation, infrastructure and public services. General Plan Framework land use policies do not supersede the more detailed community plans and

<sup>4</sup> California Environmental Protection Agency  
California Air Resources Board, Air Quality and Land Use Handbook, April 2005. Available at: <https://ww3.arb.ca.gov/ch/handbook.pdf>. Accessed August 23, 2019.

<sup>5</sup> City of Los Angeles, Department of City Planning, General Plan Framework Element, 1995. Available at: <https://planning.lacity.org/FrameWork.html>. Accessed, August 23, 2019.

specific plans because the more specific plans are adopted as updated to the General Plan for the areas they cover.

The General Plan Framework Land Use Chapter 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 generally located in a part of Hollywood that is designated as a "Regional Center" under the General Plan Framework and as such, is designated as a high-density place, and a focal point of regional commerce, identity, and activity.<sup>6</sup> The Regional Center designation will generally fall within floor-area ratios (FAR) from 1.5:1 to 6.0:1 and are characterized by structures with 6 to 20 stories (or higher).<sup>7</sup> Based on the existing Hollywood Community Plan and zoning designations described in more detail below, the Regional Center Commercial designation of the West and Center Parcels are consistent with this designation. The three (3) East Parcels along Vista Del Mar Avenue are designated under the General Plan as Multiple Family Medium Residential and fall outside of the Regional Center designation area.<sup>8</sup>

(i) *Regional Center*

Table 3-1 of the General Plan Framework lists the following as typical land use standards and development characteristics within a Regional Center:<sup>9</sup>

- 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.<sup>10</sup> The density of Regional Centers also supports the

<sup>6</sup> City of Los Angeles Department of City Planning, General Plan Framework Element, Figure 3-1, *Long Range Land Use Diagram*, Metro (July 27, 1995) Available at: <https://planning.lacity.org/cwd/framwk/chapters/03/F31MtoMp.pdf>. Accessed, August 23, 2019.

<sup>7</sup> Ibid.

<sup>8</sup> General Plan Framework Element, Chapter 3. Available at: <https://planning.lacity.org/cwd/framwk/chapters/03/03.htm>. Accessed, August 23, 2019.

<sup>9</sup> General Plan Framework Element, Chapter 3, Table 3-1, Land Use Standards, page 3-13. Available at: <https://planning.lacity.org/cwd/framwk/chapters/03/03.htm>. Accessed, August 23, 2019.

<sup>10</sup> General Plan Framework Element, page 3-24.

development of a comprehensive and inter-connected network of public transit and services.<sup>11</sup>

(ii) *Multi-Family Residential*

Table 3-1 of the General Plan Framework lists the following as typical land use standards and development characteristics within Multi-Family Residential:<sup>12</sup>

- Multi-family dwelling units
- Supporting uses (parks, schools, community centers, etc.)
- Medium Density: 30-55 dwelling units/net acre

The intent of Multi-Family Residential is to maintain existing stable multi-family residential neighborhoods and establish high quality multi-family dwellings through design, amenities, and open space. The loss of units in these locations can be offset by the provision of new housing opportunities in mixed-use districts, centers, and boulevards.<sup>13</sup>

The Housing Chapter of the General Plan Framework states that housing production has not kept pace with the demand for housing. According to the General Plan Framework, the City of Los Angeles 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 provided in 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 provide 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.<sup>14</sup>

The Urban Form and Neighborhood Design Chapter of the General Plan Framework 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

Available at: <https://planning.lacity.org/cwd/framwk/chapters/03/03.htm> Accessed, August 23, 2019.

<sup>11</sup> General Plan Framework Element, page 3-25.

Available at: <https://planning.lacity.org/cwd/framwk/chapters/03/03.htm> Accessed, August 23, 2019.

<sup>12</sup> General Plan Framework Element, Table 3-1, Land Use Standards, page 3-13.

Available at: <https://planning.lacity.org/cwd/framwk/chapters/03/03.htm>. Accessed, August 23, 2019

<sup>13</sup> General Plan Framework Element, page 3-18.

Available at: <https://planning.lacity.org/FrameWork.html>. Accessed, August 23, 2019.

<sup>14</sup> General Plan Framework Element, Chapter 4, pages 4-1 – 4-2.

Available at: <https://planning.lacity.org/cwd/framwk/chapters/04/04.htm>. Accessed, August 23, 2019.



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 General Plan Framework 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.<sup>15</sup>

The Open Space and Conservation Chapter of the General Plan Framework 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 suggests 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.<sup>16</sup>

The Economic Development Chapter of the General Plan Framework includes policies to facilitate business development and retention and job growth. To establish a basis for the interrelated goals of job creation, stimulation of Citywide economic development, and the provision of development incentives, the following types of areas are the focus of this Chapter:

- Existing commercial centers and corridors
- Existing growing industrial/business sectors
- Existing large industrial sites suitable for reuse
- Emerging commercial and industrial areas, perhaps without current suitable sites
- Existing Enterprise Zones and Incentive Areas
- Adopted Center locations
- Proposed community focal points and transit centers
- Existing and projected transit facilities concentrations.<sup>17</sup>

<sup>15</sup> General Plan Framework Element, Chapter 5. Available at: <https://planning.lacity.org/cwd/framwk/chapters/05/05.htm>. Accessed August 23, 2019.

<sup>16</sup> General Plan Framework Element, Chapter 6. Available at: <https://planning.lacity.org/cwd/framwk/chapters/06/06.htm>. Accessed August 23, 2019.

<sup>17</sup> General Plan Framework Element, Chapter 7, page 7-1. Available at: <https://planning.lacity.org/cwd/framwk/chapters/07/07.htm>. Accessed August 23, 2019.

As shown on Figure 7-1 of the Economic Development Chapter, the Project Site is located within the Hollywood Redevelopment Project Area.<sup>18</sup>

The Transportation Chapter of the General Plan Framework 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.<sup>19</sup> The Transportation Chapter stresses that transportation investment and policies must follow a strategic plan, including capitalizing on currently committed infrastructure and the adoption of land use policies to better utilize committed infrastructure.<sup>20</sup> This Chapter of the General Plan Framework is implemented through the Mobility Plan 2035, which was adopted in September 2016 and is a comprehensive update of the Transportation Element.<sup>21</sup> The Mobility Plan 2035 is discussed further, below.

*(c) Health and Wellness Element (Plan for a Healthy Los Angeles)*

The Plan for a Healthy Los Angeles is a new Health and Wellness Element of the City's General Plan<sup>22</sup> that provides 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 Plan includes the following seven goals:

- Los Angeles, A Leader in Health and Equity
- A City Built for Health
- Bountiful Parks and Open Spaces
- Food that Nourishes the Body, Soul, and Environment
- An Environment Where Life Thrives
- Lifelong Opportunities for Learning and Prosperity
- Safe and Just Neighborhoods

<sup>18</sup> General Plan Framework Element, Chapter 7, Figure 7-1. Available at: <https://planning.lacity.org/cwd/framwk/chapters/07/07.htm>. Accessed August 23, 2019.

<sup>19</sup> General Plan Framework Element, Chapter 8, page 8-2. Available at: <https://planning.lacity.org/cwd/framwk/chapters/08/08.htm>. Accessed August 23, 2019.

<sup>20</sup> Ibid.

<sup>21</sup> General Plan Framework Element, Chapter 8. Available at: <https://planning.lacity.org/cwd/framwk/chapters/08/08.htm>. Accessed August 23, 2019

<sup>22</sup> 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, available at: [https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan\\_for\\_a\\_Healthy\\_Los\\_Angeles.pdf](https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf). Accessed August 2019.

(d) *Housing Element*

The Housing Element of the General Plan was prepared and is regularly updated pursuant to State law, and provides planning guidance in meeting the housing needs that are identified in SCAG's Regional Housing Needs Assessment (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 to implement to create and preserve sustainable, mixed-income neighborhoods across the City. The Housing Element also identifies the goals of the Framework Element Housing Chapter to encourage infill development and increased density in higher-intensity commercial and mixed-use districts, centers and boulevards, in proximity to transit. The most recent Housing Element was adopted in December 2013 and addresses the housing needs for 2014 – 2021. The housing policies of the Housing Element are evaluated in Subsection 3, Project Impacts, below. The Housing Element is also discussed in Section IV.J, *Population and Housing*, of this Draft EIR.

(e) *Hollywood Community Plan*

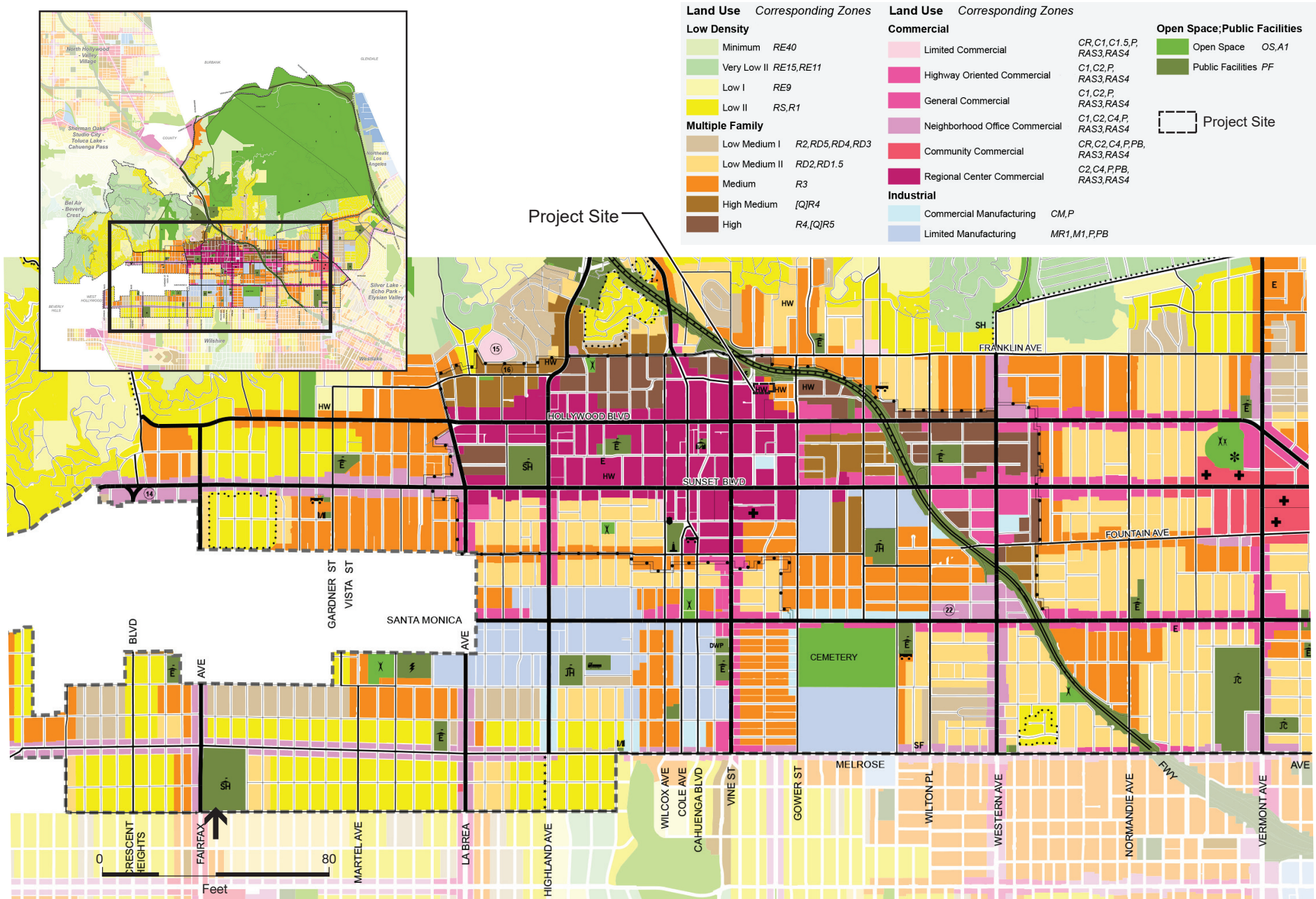
The land use policies and standards of the General Plan Framework and the General Plan Elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the City, defining locally the General Plan Framework's more general 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's consistency with applicable land use policies in the Hollywood Community Plan is analyzed in Subsection 3(d), Project Impacts, below.

(i) *1988 Hollywood Community Plan*

The Project Site is located within the boundaries of the Hollywood Community Plan, adopted in 1988. As shown on **Figure IV.H-1, Land Use Designations**, the West Parcel and Center Parcel of the Project Site are designated Regional Center Commercial and the East Parcels are designated Multiple Family Medium Residential.

According to the 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, shown in Figure IV.H-1:

*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.*



SOURCE: Los Angeles Department of City Planning - Systems , GIS and Graphics Division, April 2014

6220 West Yucca Project  
**Figure IV.H-1**  
 Land Use Designations

The corresponding zoning designation for the Medium Residential is R3 (multiple residential). As noted in footnote 4 of the Hollywood Community Plan General Plan Land Use Map (see Figure IV.H-1):

*This designation] may be limited to Height District 1XL or to less than maximum R3 zoning density.*

As Figure IV.H-1 shows, this Medium Residential designation is borne by other sites generally located east of the Project Site, west of Gower Street, and north of Hollywood Boulevard. The Regional Center Commercial designation is borne by other sites west and south of the Project Site along Argyle Avenue, Vine Street, Hollywood Boulevard, and Sunset Boulevard.

(ii) *Hollywood Community Plan Update (HCPU2)*

The City of Los Angeles Department of City Planning is currently updating the *Hollywood Community Plan*, and a Draft Environmental Impact Report was released for public comment in November 2018.<sup>23</sup> The current update, known as the *Hollywood Community Plan Update 2* (HCPU2), follows the former *2012 Hollywood Community Plan Update*, which was rescinded by the City Council on April 2, 2014. The purposes of the HCPU2 are listed below. Note, however, that the HCPU2 is in draft form and until its adoption, the 1988 plan remains the active plan for the Hollywood Community. Correspondingly, this analysis is based on the 1988 Hollywood Community Plan.

- To outline a vision for Hollywood's long-term physical and economic development and community enhancement;
- To provide strategies and specific implementing actions that will allow this vision to be accomplished;
- To establish a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards;
- To direct City departments, other public agencies, and private developers to design projects that enhance the character of the community, taking advantage of its setting and amenities; and
- To provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Zoning Ordinance, design overlays, development standards, the Capital Improvements Program, facilities plans, and redevelopment and area plans.

<sup>23</sup> City of Los Angeles, Department of City Planning, Hollywood Community Plan Update. Available at: <https://www.hcpu2.org>. Accessed August 29, 2019.

(f) *Hollywood Redevelopment Project and Plan*

The Hollywood Redevelopment Plan was first adopted in 1986, and was last amended in May 2003.<sup>24</sup> The Project End Date for the Hollywood Redevelopment Program is May 7, 2027.<sup>25</sup>

The Hollywood Redevelopment Project and Plan were adopted pursuant to State laws, and carried out by the Community Redevelopment Agency (CRA). In 2011 the State approved ABx1-26, which dissolved approximately 400 redevelopment agencies in California. ABx1-26 dissolved redevelopment agencies but did not dissolve the redevelopment plans. Accordingly, the existing Redevelopment Project Areas and the City's Redevelopment Plan remain in effect so long as they are not rescinded or otherwise invalidated by action of the City. Pursuant to ABx1-26, in August 2011, the Los Angeles City Council adopted an ordinance authorizing CRA/LA, a Designated Local Authority (DLA) and successor to the CRA to oversee projects that were formerly under the authority of the CRA.

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, the Los Angeles City Council has 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.<sup>26</sup>

As further clarified by the CRA/LA and applicable to the Hollywood Redevelopment Project area, Community Plan land use and zoning designations prevail over Redevelopment Plan map designations and future permit applications do not require discretionary land use approvals from CRA/LA. However, projects will continue to be reviewed by the City Planning Department for conformance with the Hollywood Redevelopment Plan.<sup>27</sup>

The Hollywood Redevelopment Plan contains numerous goals. These goals include encouraging economic development; promoting and retaining the entertainment industry; revitalizing the historic core; preserving and expanding housing for all income groups; meeting social needs of area residents; providing urban design guidelines; and preserving historically significant structures. This Plan also provides a number of development

<sup>24</sup> City of Los Angeles, Hollywood Redevelopment Plan, adopted May 7, 1986, amended May 20, 2003, <http://www.crala.org/internet-site/Projects/Hollywood/upload/HollywoodRedevelopmentPlan.pdf>. Accessed November 20, 2017.

<sup>25</sup> CRA/LA, A Designated Local Authority, Hollywood Redevelopment Project Area Overview. Available at: <http://www.crala.org/internet-site/index.cfm>. Accessed November 20, 2017.

<sup>26</sup> Case No.: CPC-2013-3169-CA. CEQA No.: ENV-2013-3170-CE. Council File No. 13-1482-S1.

<sup>27</sup> CRA/LA, A Designated Local Authority, Memorandum to Governing Board – Clarification Regarding Discretionary Land Use Actions, June 21, 2012. Available at: [http://www.crala.org/internet-site/Meetings/Board\\_Agenda\\_2012/upload/June\\_21\\_2012\\_Item\\_6.pdf](http://www.crala.org/internet-site/Meetings/Board_Agenda_2012/upload/June_21_2012_Item_6.pdf). Accessed September 19, 2019.

guidelines and procedural operations to attain the plan goals. Among other guidelines the Hollywood Redevelopment Plan describes land uses permitted in the Project Area and provides density standards for development. For Regional Center Commercial land uses, proposed development is generally limited 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 allowable density for Medium Density Residential land uses is up to 40 units per gross acre (which includes the site area plus one half of any abutting street(s) and alley(s)).

(g) *City of Los Angeles Municipal Code (LAMC)*

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 for the West, Center, and East Parcel. The Project Site is located within an area predominated by commercial zoning classifications.

The West Parcel is zoned C4-2D-SN. The C4 in the zoning designation indicates commercial uses, which when designated in a Regional Center is inclusive of multiple dwelling residential uses consistent with the R5 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. The “D” indicates a Development Limitation, which provides a project shall not exceed a 2:1 FAR, unless certain approvals are obtained.<sup>28</sup> The “SN” designates a Sign District, which that was adopted to promote 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. The Sign District is further discussed in Section IV.A, *Aesthetics*, of this Draft EIR.

The Center Parcel is zoned R4-2D. The R4 indicates multiple dwelling units, which permits a density of 400 square feet of lot area per dwelling unit. The current R4 zoning is not consistent with the Center Parcel’s Regional Center Commercial General Plan land use designation because the R4 Zone does not permit commercial uses. The “2” indicates Height District 2, and the “D” indicates a Development Limitation as described above for the West Parcel.

The East Parcels are zoned [Q] R3-1XL. The R3 indicates multiple dwelling units, which permits a density of 800 square feet of lot area per dwelling unit. The “1XL” indicates Height District 1XL, which limits building height to 30 feet with a maximum FAR of 3:1. The “[Q]” portion of the zoning refers to site-specific “Qualified Conditions” that are more restrictive than the underlying zoning. For the Project Site, the [Q] condition limits residential density to a maximum of one dwelling unit for each 1,200 square feet of lot area.<sup>29</sup>

<sup>28</sup> Development Limitation is pursuant to Ordinance No. 165662; May 7, 1990.

<sup>29</sup> City of Los Angeles, Ordinance No. 165662. Available at: [https://planning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20F\\_Proposed%20Q%20Q](https://planning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20F_Proposed%20Q%20Q)







LAMC Chapter XV includes the City's Rent Stabilization Ordinance (RSO). The RSO includes local regulations that implement the Ellis Act, a State law that regulates the transition of certain rental units to other uses.<sup>30</sup> The Los Angeles Housing and Community Investment Department (HCIDLA) administers the RSO, which also protects tenants from excessive rent increases while allowing apartment owners a reasonable return on their investments. The RSO covers rental properties of two or more units on a single lot that were built before 1978. The RSO outlines requirements for allowable rent increases, registration of rental units, legal reasons for evictions, and types of evictions requiring payment of tenant relocation assistance. Under the RSO, project applicants are required to provide relocation assistance to existing tenants of RSO units that are replaced. For such tenants, applicants are required to provide relocation assistance in the form of a specified monetary payment set by the RSO that is meant to cover relocation expenses. The RSO also imposes certain replacement unit requirements where RSO units are replaced.<sup>31</sup>

Chapter IX, Article 9 includes the City's Green Building Code. The City has adopted regulations regarding the filtration of outdoor air for indoor environments. Subsections 99.04.504 and 99.05.504 require that buildings located within 1,000 feet of a freeway provide regularly occupied areas of the building with air filtration media for outside and return air that meet or exceed the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 13, to the satisfaction of the City of Los Angeles Department of Building and Safety. Per ASHRAE Standard 52.2 (2012), MERV 13 would result in a removal efficiency of 50 percent for particles from 0.3 to 1.0 micrometers ( $\mu\text{m}$ ), 85 percent for 1.0 to 3.0  $\mu\text{m}$ , and 90 percent for 3.0 to 10.0  $\mu\text{m}$ .<sup>32</sup>

#### (h) *2010 Bicycle Plan and Mobility Plan 2035*

The City's 2010 Bicycle Plan (Bicycle Plan), adopted March 1, 2011, has been incorporated into the Mobility Plan 2035.<sup>33, 34</sup> The Bicycle and Mobility Plans establish long-range goals, objectives, and policies at a citywide level and contain a range of programs intended to create a more bicycle-friendly Los Angeles.<sup>35</sup> With the underlying

<sup>30</sup> Cal. Gov't Code §§ 7060 et seq.

<sup>31</sup> LAMC §151.28. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/J203.pdf>. Accessed September 2019.

<sup>32</sup> American Society of Heating, Refrigerating and Air-Conditioning Engineers, Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size, 2015 Supplement, [https://www.ashrae.org/File%20Library/Technical%20Resources/Standards%20and%20Guidelines/Standards%20Addenda/52\\_2\\_2012\\_2015Supplement.pdf](https://www.ashrae.org/File%20Library/Technical%20Resources/Standards%20and%20Guidelines/Standards%20Addenda/52_2_2012_2015Supplement.pdf). Accessed March 2018.

<sup>33</sup> City of Los Angeles Department of City Planning, 2010 Bicycle Plan, Adopted March 2011. Available at: <https://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf>. Accessed August 23, 2019.

<sup>34</sup> City of Los Angeles Department of City Planning, Mobility Plan 2035 An Element of the General Plan, adopted by City Council, January 20, 2016. Available at: <https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Accessed August 23, 2019. Although adopted by City Council, the Mobility Plan is currently under litigation.

<sup>35</sup> City of Los Angeles Department of City Planning, 2010 Bicycle Plan: A Component of the City of Los Angeles Transportation Element, adopted by Los Angeles City Council March 1, 2011, page 1-17. Available at: [http://clkrep.lacity.org/online/docs/2010/10-2385-S2\\_MISC\\_07-11-2011.pdf](http://clkrep.lacity.org/online/docs/2010/10-2385-S2_MISC_07-11-2011.pdf). Accessed

purpose of increasing, improving, and enhancing bicycling in the City as a safe, healthy, and enjoyable means of transportation and recreation, the Bicycle Plan's main goals are to (1) increase the number and type of bicyclists in the City, (2) make every street a safe place to ride a bicycle, and (3) make the City of Los Angeles a bicycle-friendly community. Objectives include developing a comprehensive transportation and recreation bikeway system for the City of Los Angeles; providing convenient and secure bicycle parking and support facilities citywide; expanding bicyclists' mobility through the integration of bicycling into the City's transit system; encouraging and facilitating bicycle riding as an important mode of personal transportation as well as a pleasant source of outdoor exercise; assuring a safe bicycling environment for riders of all experience levels; designing and maintaining all streets so that they incorporate Complete Street standards; providing a safe and comfortable Class I Bikeway and park experience for all users; and other education and funding related objectives.<sup>36</sup>

The Bicycle Plan designates a 1,684-mile Citywide Bikeway System comprising three bikeway networks, including the Backbone, Neighborhood Network, and Green Network. The character, choice of street segments, and implementation of these three networks are intertwined, and build off the existing 334 miles installed over the past thirty years. The Bicycle Plan also defines the Bicycle Friendly Street, a new Class III Route design that introduces street-calming engineering treatments on local and collector streets in order to provide a comfortable bicycling environment.

The Bicycle Plan identifies Yucca Street as a Future Designated Bicycle Lane, a component of the Backbone Bikeway Network. Argyle Avenue is designated as a Bicycle Friendly Street. Hollywood Boulevard is identified as a Future Designated Bicycle Lane, a component of the Backbone Bikeway Network. Vine Street is identified as an Existing Designated Bicycle Route and part of the Backbone Bikeway Network between Melrose Avenue and Hollywood Boulevard, and as a Future Designated Bicycle Lane between Melrose Avenue and Yucca Street.

The Mobility Plan 2035 redesignates the bicycle facilities based on the Bicycle Enhanced Network with a Low-Stress Bikeway System and a Bicycle Lane Network. The Mobility Plan designates Hollywood Boulevard as a Tier 1 Protected Bicycle Lane within the Bicycle Enhanced Network and designates Vine Street as a Tier 2 Bicycle Lane (striped separation on arterial roadways) within the Bicycle Lane Network. Although some routes are incorporated into the Bicycle Enhanced Network and Bicycle Lane Network, the Backbone Bikeway Network and Neighborhood Bikeway Network are relatively unchanged from the 2010 Bicycle Plan. The Mobility Plan 2035 and 2010 Bicycle Plan are further discussed in Section IV.L, *Transportation*, of this Draft EIR.

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September 2019. The 2010 Bicycle Plan has been incorporated into the Mobility Plan, which updates the Transportation Element.

<sup>36</sup> 2010 Bicycle Plan, page 4-71. Op Cit.

(i) *ZI No. 2427 (Freeway Adjacent Advisory Notice)*

The Advisory Notice for Freeway Adjacent Projects (Zoning Information File No. 2427), effective September 17, 2018, is an informational notification to inform applicants for all new projects and expansions of existing development involving sensitive uses within 1,000 feet of a freeways.<sup>37</sup> The advisory notice calls attention to existing adopted goals, objectives, policies and programs in the General Plan that address land use compatibility with respect to sites near freeways for new residential development and sensitive land uses. Although Zoning Information File 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. In the interest in providing information to the public and creating healthy communities, the City Planning Commission advises that applicants for projects requiring discretionary approval that are located within 1,000 feet of a freeway, and that include residential units and other sensitive uses, perform a health risk assessment (HRA) to enable applicants to make informed decisions about site planning from the earliest stages of project design.<sup>38</sup> Consistent with this direction, the City adopted Ordinance No. 184245 in 2016, which among other things, requires the provision of air filtration media that achieves a Minimum Efficiency Reporting Value (MERV) of 13 for regularly occupied areas of buildings located within 1,000 feet of a freeway. This requirement is now codified in Chapter IX, Article 9, Division 4, Section 99.04.504.6 of the LAMC.

The Project Site is located less than 1,000 feet south of the Hollywood Freeway, which is within the Freeway Adjacent Advisory Notice area. For informational purposes only, an HRA has therefore been prepared for the Project. See a summary of the HRA's conclusions later in this section, and in Appendix C-2 of this Draft EIR, for the Freeway HRA Technical Appendix. The Project's consistency with ZI No. 2427 is evaluated in Subsection 3(d), Project Impacts, below.

## **b) Existing Conditions**

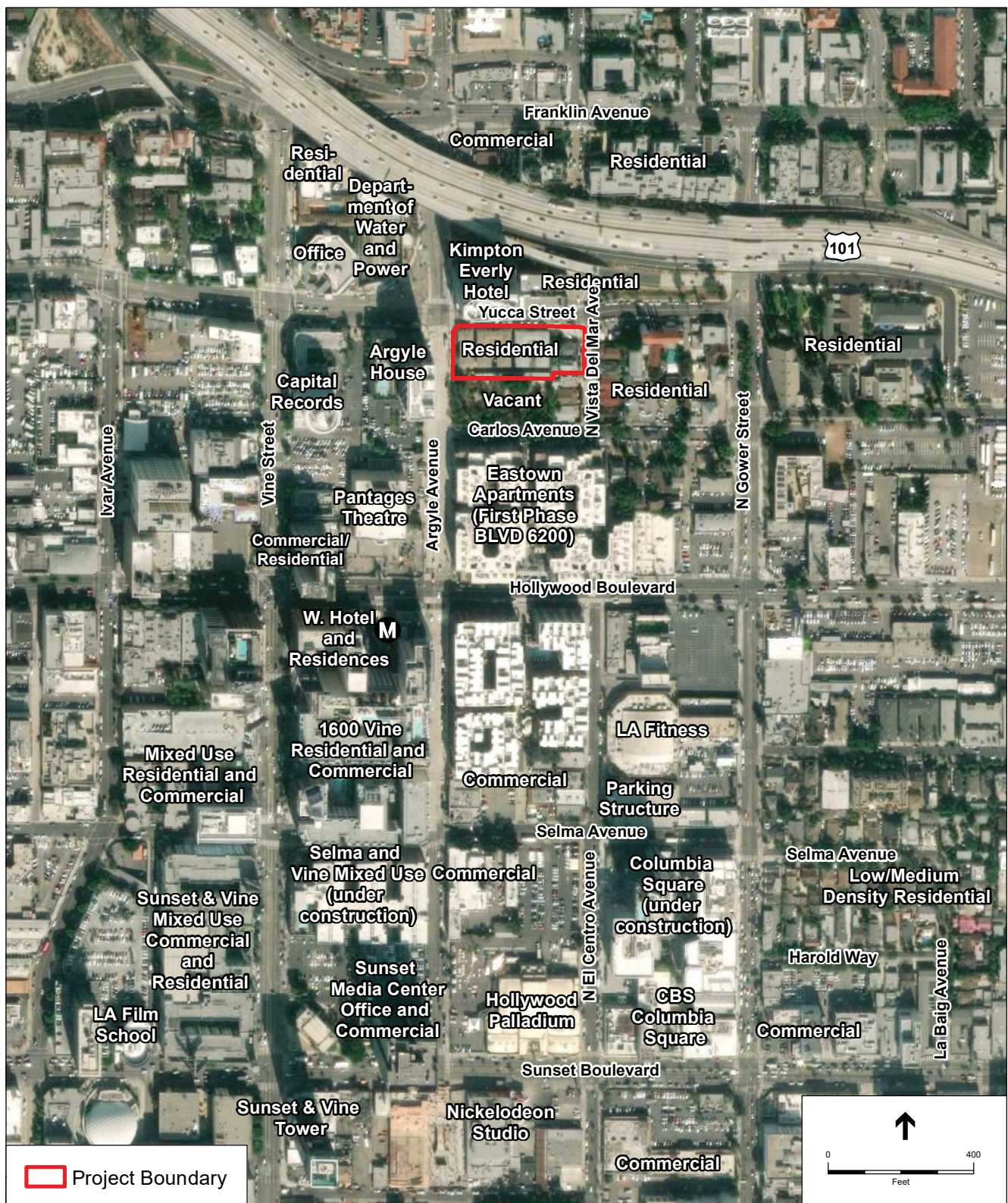
### **(1) Project Site**

The 1.16-acre Project Site is located on the south side of West Yucca Street between Argyle Avenue and North Vista Del Mar Avenue (with the corresponding addresses of 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue) in the Hollywood community of the City of Los Angeles. As shown on **Figure IV.H-3, Project Site and Surrounding Land Uses**, the Project Site is bounded by Yucca Street to the north, Vista Del Mar Avenue to the east, vacant land and garden (formerly occupied by Little Country Church of Hollywood) to the south, and Argyle Avenue to the west.

<sup>37</sup> City of Los Angeles, Zoning Information (Z.I.) No. 2427, Freeway Adjacent Advisory Notice For Sensitive Uses, Effective September 17, 2018, available at: <http://zimas.lacity.org/documents/zoneinfo/zi2427.pdf>. Accessed August 23, 2019.

<sup>38</sup> City of Los Angeles, Zoning Information (Z.I.) No. 2427, Freeway Adjacent Advisory Notice For Sensitive Uses, Effective September 17, 2018, Available at: <http://zimas.lacity.org/documents/zoneinfo/zi2427.pdf>. Accessed August 23, 2019.





SOURCE: DigitalGlobe, 2018 (Aerial).

6220 West Yucca Project  
**Figure IV.H-3**  
 Project Site and  
 Surrounding Land Uses

The Project Site is currently developed with three, two-story apartment buildings fronting Yucca Street within the western and central portion of the Project Site; one single-family residence, one duplex, and one studio apartment fronting Vista Del Mar Avenue along the eastern portion of the Project Site; and a surface parking lot at the southwest corner of Yucca Street and Vista Del Mar Avenue. The 3,118 square-foot apartment building on the western portion of the Project Site at the corner of Yucca Street and Argyle Avenue includes eight residential units.

The two, 6,236 square-foot apartment buildings located farther to the east within the eastern and central portion of the Project Site include 16 residential units each. The 1,367 square-foot single-family residence (built in 1920), the 2,942 square-foot duplex (built in 1918), and 500 square-foot studio apartment above the duplex's detached garage, are located on the eastern portion of the Project Site.

The Project Site is well-served by a network of regional transportation facilities providing connectivity to the larger metropolitan region. Major roadways in the Project Site vicinity, all served by Los Angeles County Metropolitan Transportation Authority (Metro), Metro Local, Metro Rapid, and Metro Limited bus lines, include Hollywood Boulevard, Vine Street, and Sunset Boulevard. The Metro Red Line runs under Hollywood Boulevard, with the nearest station approximately 0.13 miles southwest of the Project Site at the intersection of Hollywood Boulevard and Vine Street. The Project Site is also served by three Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle (DASH) Lines. The Hollywood Freeway (US Route 101) is approximately 200 feet north of the Project Site at its closest point. Access to and from the Hollywood Freeway is available via interchanges at Cahuenga Boulevard, Franklin Avenue (at Vine Street and Argyle Avenue), Gower Street, and Hollywood Boulevard.

### (1) Surrounding Uses

As shown on Figure IV.H-3, the Project Site vicinity is highly-urbanized and generally built out. The local vicinity is part of the active regional center of Hollywood, containing a mix of commercial, hotel, studio/production, office, entertainment, and residential uses. There are also several areas in the Project Site vicinity that are currently under construction due to a recent resurgence of development and revitalization of the Hollywood area. North of Yucca Street is a Los Angeles Department of Water and Power facility, the 16-story, 225-room Kimpton Everly Hotel, and three-story residential lofts, and the Hollywood Freeway; east of Vista Del Mar Avenue are one- and two-story single-family residences and duplexes; south of the Project Site and south of the vacant land are one- and two-story single-family residences and duplexes, a five-story mixed-use residential and commercial development (Eastown Apartments), W Hotel and residences, 1600 Vine (residential and commercial), Selma and Vine mixed use (under construction), Sunset Media Center (office and commercial), Columbia Square mixed use (under construction), the Hollywood Palladium, and other mixed residential and commercial uses; and west of Argyle Avenue and the Project Site is the 16-story, 85-unit Argyle House Project, the Capital Records building, the Pantages Theater, and commercial uses.

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project could have a potentially 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.***

In assessing the Project's potential impacts related to land use in this section, the City has determined to use the land use and planning checklist questions in Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the City's 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in determining significance under the Appendix G thresholds:

##### (1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the existing Community Plan, Redevelopment Plans or Specific Plans for the site.
- 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 types 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 project.

#### b) Methodology

The analysis of the Project's potential land use impacts considers the Project's consistency with applicable plans, policies, regulations, development guidelines, and in some instances advisory guidance that regulate land use on the Project Site, based upon a review of the relevant regulatory planning documents identified above as well as the compatibility of the proposed uses with surrounding land uses. It also considers the Project's consistency with plans and policies intended to reduce the impacts of development and redevelopment on the environment.



State CEQA Guidelines Section 15125(d) requires that an EIR discuss any project inconsistencies with applicable plans that the decision-makers should address. For purposes of this analysis, the Project is considered consistent with regulatory plans if it meets the general intent of the plans and/or would not preclude the attainment of their primary goals. The criterion for determining a significant land use plan impact is based on the potential for the Project to substantively conflict with, or actively obstruct the implementation of plans adopted for the purpose of avoiding or mitigating an environmental effect. Mere inconsistency with a plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment. A project need not be in perfect conformity with each and every written policy of a city, particularly since different policies can conflict with one another.<sup>39</sup> More specifically, State law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in general “agreement or harmony” with the applicable land use plan to meet the standard for consistency with that plan.<sup>40</sup>

### **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 Chapter VI (subsection *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 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 land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

#### **(1) Consistency with Local Plans and Applicable Policies**

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 regulations, plans, and policies are addressed below, including the City’s General Plan Framework, Health and Wellness Element (Plan for a Healthy Los Angeles), Housing Element, Hollywood Community Plan, Hollywood Redevelopment Project and Plan, LAMC, and ZI No. 2427 (Freeway Adjacent Advisory

<sup>39</sup> See *Sequoyah Hills Homeowners Assoc. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

<sup>40</sup> Ibid.

Notice). The analysis of the Project's consistency with applicable regional measures addresses goals and policies contained in SCAG's 2016 RTP/SCS.

The Project's consistency with other applicable Plans is addressed in other sections of this Draft EIR. Specifically, the Project's consistency with the AQMP is analyzed in Section IV.B, *Air Quality*; and its consistency with Senate Bill 375 and SCAG's Sustainable Communities Strategy is discussed in Section IV.F, *Greenhouse Gas Emissions*. In addition, Project consistency with the Air Quality Element of the General Plan is discussed in Section IV.B, *Air Quality*. Each of these consistency analyses concludes that the Project would not cause a significant environmental impact due to a conflict with the analyzed plan.

(a) *City of Los Angeles General Plan Framework Element*

**Table IV.H-1, *Comparison of the Project to Applicable Policies of the General Plan Framework Element***, evaluates the consistency of the Project with objectives and policies of the General Plan Framework Element. As discussed in Table IV.H-1, the Project would be generally consistent with applicable objectives and policies of the General Plan Framework Element. Specifically, the Project would be generally consistent with the objectives and policies of the Land Use Chapter to provide a diversity of uses in accordance with the Regional Center Designation (Objective 3.1). The Project would concentrate mixed-use development along a corridor within 0.13 miles of the Hollywood/Vine Metro Red Line, other public transit, and within walking distance of a broad range of uses so as to reduce vehicle trips (Objective 3.2). The Project would provide a broad range of uses within a Regional Center (Objective 3.10). Regarding consistency with the General Plan Framework's policy and related objectives to preserve residential neighborhoods (Policy 3.2.4, Objectives 3.4, 3.7, 3.15), although the Project would remove three apartment buildings, a single-family residence, a duplex, and a studio apartment, these would be replaced with 210 multi-family units, and, where the Project interfaces with the residential neighborhood along Vista Del Mar (Building 2), only residential uses are proposed. Building 2 would provide three stories of residential uses over parking and maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. A 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue. In accordance with Objective 3.16, the Project would enhance pedestrian activity by providing streetscape amenities including potential café tables, parkway planters, and bicycle parking along Yucca Street and Argyle Avenue; and ground level retail and restaurant uses along Yucca Street and Argyle Avenue.

The Project would be consistent with the objectives and policies of the General Plan Framework Housing Chapter by including development of new multi-family housing in proximity to public transit. All of the Project's 210 residential units would be subject to the City's RSO. By providing open space and recreational amenities for Project residents, such as a 10,610- square-foot podium courtyard, 3,740-square-foot pool/roof garden, gym, balconies and other amenities in Building 1 and 375-square-foot amenity space, 875-square-foot roof garden, and balconies in Building 2, as well as landscaping along



Yucca Street, Argyle Avenue, and Vista Del Mar Avenue, the Project would be consistent with the Open Space and Conservation Chapter's Policy 6.4.8 to encourage the improvement of open space on public and private property.

**TABLE IV.H-1**  
**COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE GENERAL PLAN**  
**FRAMEWORK ELEMENT**

Recommendation	Would the Project Conflict?
<b>Land Use Chapter</b>	
<p>Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.</p>	<p><b>No Conflict.</b> The Project provides for residential, hotel, and restaurant/retail uses within a single development project, and locates the Project in proximity to the Hollywood community's commercial district, a designated Regional Center. The Regional Center is a focal point of regional commerce and activity and containing a diversity of uses, such as corporate and professional offices, retail and restaurant uses, entertainment and cultural facilities, high- and medium density residential uses, and supporting services. The Project's mix of residential and commercial land uses within a single site, and the proximity of the Project to the Hollywood Regional Center and its location in a High Quality Transit Area (HQTa) and Transit Priority Area (TPA) contributes to a balanced distribution of services, jobs, and residents within walking distances and, as such, would reduce vehicle miles associated with commutes between work, home, and services. Fewer vehicle miles result in reduced vehicle emissions, energy demand, and mobile noise impacts. In addition, the Hollywood Community is developed with existing roadways, public services, utilities, and other infrastructure, including the 101 Freeway. As such, the location of the Project in the proposed location would conserve resources that might otherwise be required for new development within a less established location.</p>
<p><b>Policy 3.1.4:</b> Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.</p>	<p><b>No Conflict:</b> This policy provides for an urban land use pattern that avoids juxtaposition in uses that conflict in scale and type of development and thus, avoids environmental effects related to substantial degrading of an area's existing visual character or quality. The Project would be consistent with the Framework Element's Long-Range Land Use Diagram, which identifies the West and Center Parcels of the Project Site as lying within a Regional Center targeted for high density growth. Consistency with General Plan land use designations would reduce direct impacts otherwise caused by conflicting zones and land uses.</p>

Recommendation	Would the Project Conflict?
<p><b>Objective 3.2:</b> To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p><b>No Conflict.</b> The Project would contribute to the concentration of mixed-use development along a corridor with convenient access to the Metro Red Line (within 0.13 miles), Metro bus and Metro rapid bus lines, and the LADOT DASH lines. The new residential population and hotel patrons would have access to commercial development on site as well as retail, restaurant, office, and entertainment activities within walking and biking distance and via bus and rail service thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution.</p>
<p><b>Policy 3.2.1:</b> Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.</p>	<p><b>No Conflict.</b> The Project would introduce a mixed-use residential, hotel, and commercial uses within Building 1 at a maximum height to the parapet of 255 feet (relative to the low point on Argyle Avenue and 20 stories that is consistent with the more intense development along Argyle Avenue, Yucca Street, Hollywood Boulevard, and Vine Street. Building 2 would be three stories of residential uses over parking and maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. A 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue. The Project would provide additional commercial and restaurant services to adjacent neighborhoods and within an area that is well served by existing public transit.</p>
<p><b>Policy 3.2.3:</b> Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p><b>No Conflict.</b> As implemented in lieu of vehicles use, walking and cycling reduce vehicle use and respective vehicle emissions that result in adverse air pollutant emissions; demand on non-renewable energy supplies; and mobile source noise, which are all environmental concerns. This policy, which promotes pedestrian and bicycle use would contribute to the reduction of environmental effects associated with emissions, energy, and mobile source noise. As such, consistency with this policy would, respectively, reduce vehicle use and its environmental consequences. The Project would encourage walking as a mode of travel and provide pedestrian access from various at-grade sidewalks and steps equipped with potential café tables, parkway planters, and bicycle parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. The additional building setbacks along Argyle Avenue and Yucca Street would be combined to increase the width of the sidewalks and enhance pedestrian access. The Project would also provide 258 bicycle parking spaces, which is consistent with the number required by LAMC Section 12.21.A.16.</p>

**Recommendation****Would the Project Conflict?**

**Policy 3.2.4:** Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

**No Conflict.** As this policy supports siting and design to maintain the prevailing scale and character of stable residential neighborhoods, consistency with this policy would avoid environmental effects related to substantial degrading of the existing visual character or quality of a site and its surroundings. The Project would be consistent with this policy since its design would achieve compatibility with the adjacent residential neighborhood. Although the Project would result in the removal of low-rise residential structures, the 13-unit Building 2 is designed to be compatible in scale and character with the adjacent residential neighborhood. Building 2 would be three stories of residential uses over parking and would maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. The 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue. Dense shrubbery would be provided along the southern property line of the East Parcel. Building 1 would provide 197 residential units. The provision of ground level commercial and restaurant uses in Building 1 would expand and improve the services that would be available to residents in the area. The siting and design of the Project would include landscaping and potential café seating; and a modern building that would be tiered down from west to east. The tallest component (20 stories) would be oriented to Argyle Avenue and Yucca Street near similar mixed-use development, while the lower component consisting of only residential uses would be adjacent to residential uses to the south and east. This reduction in mass and scale would provide a buffer between the 20-story component and the residential neighborhood. Under the City's 2010 Bicycle Plan (incorporated into the Mobility Plan 2035), Argyle Avenue is proposed to receive bicycle-friendly street treatments (the exact nature of the potential improvements has not yet been identified by the City, nor is there any schedule for implementation). However, no feature of the Project's design would preclude the implementation of bicycle-friendly street treatments or on-street bicycle lanes.

**Recommendation****Would the Project Conflict?**

**Objective 3.4:** Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

**No Conflict:** This policy encourages new development with a mix of uses, while also conserving existing stable neighborhoods; therefore, the policy strives to reduce or avoid substantial degradation of an area's existing visual character or quality, while at the same time reducing trips and vehicle miles traveled. A project that is consistent with this policy would, therefore, reduce or avoid such impacts. The Project would be consistent with this policy in that it would provide new mixed-use development with a multi-family residential, hotel, and commercial/restaurant uses in an area well-served by public transit and within Hollywood's dense mixed-use core. Although the Project would result in the removal of one single-family residence and two duplex buildings; the residential component of the Project would provide 210 residential units. Also, the 13-unit Building 2 would create a visual and land use buffer between the tower component and the adjacent residential neighborhood. Building 2 would retain the 15-foot setback along Vista Del Mar Avenue, consistent with the front yards of the residential properties along this street, and have a maximum elevation of approximately 34 feet as viewed from Yucca Street; thus, creating a height transition between the adjacent single-family neighborhood and the 20-story Building 1.

**Objective 3.7:** Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.

**No Conflict.** This policy encourages growth in areas where sufficient public infrastructure and services are available so that services to the existing residents and their quality of life can be maintained and the stability of the multi-family neighborhoods can be enhanced. Consistency with this policy would promote these policies and help ensure that public services to existing residents can be maintained. The Project would be an in-fill Project that includes multi-family residential development in a highly urbanized area with sufficient public infrastructure and services to meet Project needs. As discussed in Section IV.K, *Public Services*, and Section IV.N, *Utilities*, impacts on public services and utilities, respectively, would be less than significant with implementation of the prescribed mitigation measures, where applicable. The Project's mixed-use character would support the vitality of the core of the Hollywood Regional Center. Although the Project would result in the removal of three apartment buildings, the Project would provide a modern building with 197 new multi-family units, 136 hotel rooms, 12,570 square feet of ground level commercial/restaurant uses, and landscaping along Yucca Street and Argyle Avenue, which would enliven the street frontage. As discussed in Section IV.A, *Aesthetics*, of this Draft EIR, the Project, which is designed with articulated surface planes, high quality building materials, and step-backs would add visual interest to the area and reduce the sense of the building's overall mass as viewed from the public street and sidewalk.

**Recommendation****Would the Project Conflict?**

**Objective 3.15:** Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

**No Conflict.** By focusing mixed commercial/residential uses around urban transit stations, this policy supports transit use and reduces dependency on the automobile, reducing trips and vehicle miles traveled. As a result, environmental impacts associated with vehicle use, such as emissions, energy demand, and mobile source noise would be reduced or avoided. Consistency with this policy would, thus, reduce environmental effects associated with motor vehicle emissions, energy demand and mobile noise. The Project would be consistent with this policy in that it would provide a new mixed-use development that includes multi-family residential, hotel, and retail uses in an area designated as an HQTa and TPA and served by the nearby Hollywood/Vine Red Line rail station (approximately 0.13 miles from the Project Site), multiple regional Metro bus routes, and LADOT DASH Lines. Although Building 2 would remove existing residential structures, Building 2 would be designed to be compatible in architectural style with the existing historical district structures. Building 2 would be three stories of residential uses over parking and would maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. The 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue. The smaller-scale building in the east sector of the Project Site provides a buffer and transition between the adjacent residential neighborhood and the 20-story building.

**Objective 3.16:** Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.

**No Conflict:** Pedestrian activity in lieu of the use of motorized vehicles reduces trips, vehicle miles and associated vehicle emissions that result in adverse air pollutant emissions; demand on non-renewable energy supplies; and mobile source noise, which are all environmental concerns. This policy, which promotes pedestrian activity, would contribute to the reduction of environmental effects associated with these emissions, energy, and mobile source noise. As such, consistency with this policy would reduce the environmental effects of vehicle use. The Project would be consistent with this policy in that it would enhance pedestrian activity through its incorporation of landscape and streetscape amenities. The exterior boundaries of the Project Site along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue would provide streetscape amenities for pedestrians, including potential café tables, parkway planters, and bicycle parking. The increased building setbacks along Argyle Avenue and Yucca Street would be combined to increase the width of the sidewalks and enhance pedestrian access. The Project would also include ground-level commercial uses along Yucca Street and Argyle Avenue, which would also increase pedestrian activity.

**Recommendation****Would the Project Conflict?**

**Policy 3.16.3:** Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.

**No Conflict.** Pedestrian activity in lieu of the use of motorized vehicles reduces trips, vehicle miles and associated vehicle emissions that result in adverse air quality emissions; demand on non-renewable energy supplies; and mobile source noise, which are all environmental concerns. This policy promotes pedestrian activity and, as such, contributes to the reduction of environmental effects associated with these emissions, energy, and mobile source noise. Consistency with this policy would, thus reduce the environmental effects of motor vehicle use. The Project would be consistent with this policy in that it would put street front retail and restaurant uses, as well as direct sidewalk access to these uses along Yucca Street and the corner of Yucca Street and Argyle Avenue, would promote pedestrian activity from surrounding neighborhoods.

**Housing Chapter**

**Objective 4.2:** Encourage 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 development and surrounding lower density residential neighborhoods.

**No Conflict.** The Project would provide new residential, hotel, and commercial/restaurant uses in an identified HQT and TPA and within convenient walking distance to the nearby Hollywood/Vine Red Line rail stations (approximately 0.13 miles), as well as multiple regional Metro bus routes, and LADOT DASH Lines. Within the East Parcel only residential uses, with a maximum building height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue, are proposed in order to create a buffer/transition between the adjacent lower density residential neighborhood and the Building 1, 20-story tower.

**Open Space and Conservation Chapter**

**Policy 6.4.8.a:** Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.

**Policy 6.4.8.b:** Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of “unbuildable” areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.

**No Conflict.** The Project would provide 24,350 square feet of open space, which would exceed the City’s opens space requirements, including open spaces on the ground level and atop 4<sup>th</sup> level in Building 1 and on the roofs of both buildings, in addition to private balconies.

In addition, building setbacks would allow for substantially increased landscaping along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue, as well as streetscape and café seating on Yucca Street.

Recommendation	Would the Project Conflict?
<b>Economic Development</b>	
<p><b>Objective 7.2:</b> Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.</p>	<p><b>No Conflict.</b> The Project would bring new investment to Yucca Street and Argyle Avenue in the form of 12,570 square feet of neighborhood-serving commercial uses. It would increase the amount of commercial services along a mixed-use corridor that is well served by public transportation. The Project's new residential and hotel development would provide support for local businesses.</p>
<p><b>Policy 7.2.2:</b> Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.</p>	<p><b>No Conflict.</b> Within the Regional Center, the Project would provide new mixed-use development in an area served by the nearby Metro Red Line rail station, multiple regional Metro bus routes, and LADOT DASH Lines. The commercial component of the Project would be located in the West and Center Parcels (in Building 1) within Hollywood's dense mixed-use core, while the East Parcel would be developed entirely with residential uses. Building 2 is designed to be more compatible in scale and character with the adjacent residential neighborhood. Building 2 would be three stories of residential uses over parking and would maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. A 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue.</p>
<p><b>Policy 7.2.3:</b> Encourage new commercial development in proximity to rail and bus transit corridors and stations.</p>	<p><b>No Conflict.</b> By encouraging new commercial development in proximity to rail and bus transit corridors and stations, this policy encourages alternative modes of travel and would reduce dependency on automobile travel. By reducing motor vehicle travel, this policy would reduce environmental effects associated with vehicle emissions, energy demand, and mobile source noise. As such, consistency with this policy would, respectively, reduce vehicle use and these environmental effects. The Project would be consistent with this policy because it would provide retail, restaurant, and hotel uses within walking distance of the Hollywood/Vine Metro Station, DASH, and other Metro bus services.</p>
<p><b>Policy 7.2.5:</b> Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.</p>	<p><b>No Conflict.</b> The incorporation of retail uses under this policy would allow on-site and nearby residents to meet their shopping needs by walking or bicycling and, as such, would reduce dependency on motor vehicles. As such, this policy would reduce air pollutant emissions, mobile source noise, and energy demand impacts associated with automobiles. Consistency with this policy would also reduce dependency on automobiles and associated environmental effects. The Project would be consistent with this policy since it would provide restaurant and retail uses in combination with residential uses.</p>

Recommendation	Would the Project Conflict?
<b>Transportation</b>	
<p><b>Objective 8.3:</b> Support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plans.</p>	<p><b>No Conflict.</b> By supporting development in regional centers, community centers, major economic activity areas and along mixed-use boulevards, this policy concentrates development in areas with a mix of jobs, housing, retail, restaurant, and entertainment uses and, as such, accommodates populations within their immediate communities and avoids the need for additional travel. Reduced travel would reduce dependency on automobiles and associated air pollutant emissions, mobile source noise, and energy demand environmental effects. Consistency with this policy would reduce the environmental consequences of automobile dependency. The Project would be consistent with this policy in that it would be located within Hollywood's Regional Center shown in the General Plan Framework Element's Figure 3-1. Development of the residential, hotel, and commercial/restaurant components of the Project would support the intent of the Regional Center designation by providing additional housing, employment opportunities, and new commercial services in proximity to a range of uses in the Hollywood Center.</p>
<p><b>Objective 8.4:</b> Preserve the existing character of conservation areas and maintain pedestrian-oriented environments where appropriate.</p>	<p><b>No Conflict.</b> This policy supports pedestrian activity and reduced dependency on the automobile. As a result, environmental impacts associated with vehicle use, such as air pollutant emissions, energy demand, and mobile source noise would be reduced or avoided. Consistency with this policy would, thus, reduce environmental effects associated with those emissions, energy demand and mobile source noise. The Project would be consistent with this policy in that it would provide pedestrian access from various at-grade sidewalks and steps equipped with potential café tables, parkway planters, and bicycle parking along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue.</p> <p>The Project would also provide direct sidewalk access to the new commercial and restaurant uses along Yucca Street and Argyle Avenue, preserving and supporting the existing pedestrian patterns.</p>

SOURCE: ESA, 2019.

The Project would be consistent with Objectives 8.3 and 8.4 of the Transportation Chapter because it would provide uses that complement current uses within a Regional Center and provide pedestrian access between the Project Site and Yucca Street, Argyle Avenue, and Vista Del Mar Avenue. The Project would also provide direct sidewalk access to the new commercial and restaurant uses along Yucca Street and Argyle Avenue. Based on the above, the Project would be consistent with these applicable objectives and policies of the General Plan Framework related to the reduction of environmental effects.



(b) *City of Los Angeles General Plan Health and Wellness Element (Plan for a Healthy Los Angeles)*

**Table IV.H-2, Comparison of the Project to Applicable Policies of the Health and Wellness Element (Plan for a Healthy Los Angeles)**, evaluates the consistency of the Project with the applicable policies of the Health and Wellness Element of the City's General Plan. In summary, as shown on Table IV.H-2, the Project would be consistent with the objectives of the Health and Wellness Element, as it would provide additional housing and employment opportunities for the Hollywood community and provide relocation assistance for residents, would incorporate healthy building design, would provide pedestrian and bicycle improvements to promote healthy living, would provide adequate separation from the freeway, would be located next to public transit, and would implement Project Design Features to reduce air quality impacts. Therefore, the Project would be consistent with the applicable goals set forth in the Health and Wellness Element.

**TABLE IV.H-2  
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE HEALTH AND WELLNESS  
ELEMENT (PLAN FOR A HEALTHY LOS ANGELES)**

Plan Policies	Would the Project Conflict?
<p><b>Policy 1.7 Displacement and Health:</b> Reduce the harmful health impacts of displacement on individuals, families, and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.</p>	<p><b>No Conflict.</b> The Project would not be considered a large-scale revitalization effort. The Project would demolish 44 residential units and temporarily displace approximately 88 people. However, as described in Chapter II, Project Description, the Project provides the temporarily displaced tenants the option to return to the Project following its completion. In addition, as analyzed in Section IV.J, <i>Population and Housing</i>, all residents would be eligible for assistance under the City of Los Angeles Relocation/Demolition Monitoring Program, and in compliance with RSO requirements, existing tenants on the Project Site would also be provided relocation assistance as required by the RSO. The RSO also imposes replacement unit requirements where RSO units are replaced. To comply with these requirements, the Project proposes to provide 100% of its 210 residential dwelling units as RSO units, which meets the requirements set forth in the RSO. Accordingly, the Project will increase the number of RSO units both in the Hollywood area and available in the City as a whole. The Project would result in a net increase of 166 rent stabilized dwelling units in the Hollywood Community Plan area. Furthermore, the Project would create local employment opportunities by providing 12,570 square feet of commercial/restaurant uses and a 136-room hotel.</p>

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**Plan Policies**
**Would the Project Conflict?**


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**Policy 2.2 Healthy Building Design and Construction:** Promotes a healthy built environment by encouraging the design and rehabilitation of buildings and sites for health living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universally accessibility using existing tools, practices, and programs.

**No Conflict.** The Project would ensure healthy building design and construction through compliance with the 2013 California Green Building Code (2016 CalGreen Code), Los Angeles Green Building Code, Los Angeles Building Code, Planning and Zoning Code, and voluntary compliance with United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) or equivalent standards. Relevant design features of the Project would include the use of energy efficient glass/window areas for ventilation and daylight accessibility; landscaping of podium court and roof deck; well-lit pedestrian areas; common open space for residents, including an outdoor courtyard, rooftop garden space, and outdoor dining, pool deck, and fitness center that would be shared with hotel guests.

The Project would also promote non-vehicular modes of travel. The Project would promote and enhance pedestrian-oriented circulation by providing landscaping, including street trees, and new sidewalks along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue and ground level commercial and restaurant uses.

The project would promote travel by bicycle by its inclusion of 250 short term and long term bicycle spaces, which include spaces for the retail uses as well as for the hotel and residential uses. The Project is also located in an HQT/TPA near transit and multiple bus lines with access to other areas of Hollywood and the greater Los Angeles.

Although the Project would place residential uses near the Hollywood Freeway, the HRA prepared for the Project (discussed below) concludes that residents would be located at an adequate distance from the freeway so that exposure to freeway-generated TACs would not pose a significant health risk.

The Project would ensure universal accessibility through compliance with ADA requirements.

Plan Policies	Would the Project Conflict?
<p><b>Policy 5.1 Air Pollution and Respiratory Health:</b> Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.</p>	<p><b>No Conflict.</b> The Project would implement Project Design Features to reduce air quality impacts, including compliance with the Los Angeles Green Building Code and 2016 CalGreen Code, and voluntary compliance with USGBC LEED or equivalent standards (see Sections IV.B, <i>Air Quality</i>, and IV.F, <i>Greenhouse Gas Emissions</i>, of this Draft EIR), and compliance with Rule 1470 and the Tier 4 Final standards during construction. Although the Project would place residential uses near the Hollywood Freeway, the HRA (discussed below) prepared for the Project concludes that residents would be located at an adequate distance from the freeway so that exposure to freeway-generated TACs would not pose a significant health risk.</p> <p>As discussed above regarding Policy 2.2, the design of the Project's residential development and its location along mixed-use corridors would provide opportunities for and encourage pedestrian, bicycle, and public transit. The Project would provide 258 short term and long term bicycle parking spaces.</p>
<p><b>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction:</b> Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.</p>	<p><b>No Conflict.</b> See Policy 5.1 above.</p>

SOURCE: ESA, 2019.

(c) *Los Angeles General Plan Housing Element*

As presented in **Table IV.H-3, Comparison of the Project to the Applicable Goals, Objectives, and Policies of the Housing Element**, the Project would promote safe, livable, and sustainable neighborhoods by providing new multi-family housing in a designated Regional Center; providing pedestrian improvements along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue; providing on-site security and enhancing visibility of public areas; complying with the Los Angeles Green Building Code and 2016 CalGreen Code and voluntary compliance with the USGBC LEED or equivalent standards; reducing water, energy, and waste generation; promoting the use of alternative transportation; and promoting the physical transition between uses by designing the three-story, Building 2 to buffer the adjacent residential neighborhood from the taller Building 1. As explained in the discussion of ZI No. 2427, below, the HRA prepared for the Project concluded that there would be an adequate health-based separation distance between on-site residential uses and the freeway. Therefore, the Project would be generally consistent with the

applicable goals, objectives, and policies of the Housing Element the protect the environment and, as such, impacts with respect to this plan would be less than significant.

(d) *Hollywood Community Plan*

**Table IV.H-4**, *Comparison of the Project to Provisions of the Hollywood Community Plan*, evaluates the consistency of the Project with objectives of the Hollywood Community Plan. In summary, as shown in Table IV.H-4, the Project would be consistent with the objectives of furthering the development of Hollywood as a major center of population, employment, and retail services. The Project would be consistent with the Plan's objectives related to developing additional commercial uses in appropriate locations; providing adequate public services, utilities, and open space to meet anticipated demands; coordinating land use with transportation planning; and preserving open space and views. Building 2 in the east sector of the Project Site is designed to be compatible in scale and character with the adjacent residential neighborhood. Building 2 would be three stories of residential uses over parking and would maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. A 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along the residential street. As discussed below, the Project residents would not be exposed to significant levels of TACs from the Hollywood Freeway. Therefore, the Project would be consistent with the applicable objectives of the Hollywood Community Plan.

**TABLE IV.H-3**  
**COMPARISON OF THE PROJECT TO THE APPLICABLE GOALS, OBJECTIVES, AND POLICIES OF THE HOUSING ELEMENT**

Plan Policies	Would the Project Conflict?
<b>Policy 1.1.4:</b> Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.	<b>No Conflict.</b> The Project would provide an increase in housing opportunities at the Project Site and in the Hollywood community within a designated Regional Center within proximity to numerous modes of public transit. Locating increased residential density near transit encourages transit uses and potentially reduces the use of passenger vehicles, trips, and vehicle miles traveled and associated air pollutant emissions.
<b>Policy 2.1.1:</b> Establish development standards and policing practices that reduce the likelihood of crime.	<b>No Conflict.</b> This policy would reduce demand for police services and, as such reduce or avoid substantial adverse physical impacts associated with the construction of new or physically altered police facilities, construction of which could cause significant environmental impacts. As described in Section IV.K.2, <i>Police Protection</i> , the Project would be consistent with this policy in that it would incorporate a 24-hour/seven-day security program to ensure the safety of residents and visitors, including controlled access, video surveillance, and security personnel. The design of the Project would also include well-lighted public and private areas.

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**Plan Policies**

**Policy 2.1.2:** Establish development standards and other measures that promote and implement positive health outcomes.

**Objective 2.2:** Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.

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**Would the Project Conflict?**

**No Conflict.** This policy is intended to reduce exposure to air pollutants and GHG emissions which have the potential to either individually or cumulatively result in impacts on the environment. Consistency with this policy would reduce or reduce exposure to air pollutant and GHG emissions and their consequential effects. The Project would be consistent with this policy in that it would implement Project Design Features to promote positive health outcomes, including compliance with the Los Angeles Green Building Code and 2016 CalGreen Code, and voluntary compliance with USGBC LEED or equivalent standards (see Sections IV.B, *Air Quality*, and IV.F, *Greenhouse Gas Emissions*, of this Draft EIR). *The Project would also comply with Rule 1470 and the Tier 4 Final construction equipment standards during construction.* The Project would be located along a mixed-use corridor that would provide opportunities for pedestrian, bicycle, and public transit. In addition, the Project would provide 258 short term and long term bicycle parking spaces, and would include design features that would encourage pedestrian access and activity.

Although the Project would place residential uses near the Hollywood Freeway, the HRA (discussed below) prepared for the Project concludes that residents would be located at an adequate distance from the freeway so that exposure to freeway-generated TACs would not pose a significant health risk.

**No Conflict.** This policy would encourage a mix of jobs, housing, amenities, services, and transit in sustainable neighborhoods. The proximity of these uses would reduce dependency on automobiles and air pollutant emissions, mobile source noise, energy demand, and other environmental effects associated with automobile use. Consistency with this policy would, thus, reduce these environmental effects. The Project would be consistent with this policy in that it would provide a mix of retail, restaurant, hotel, and rent-established residential uses in a Regional Center with proximity to transit.

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**Plan Policies**

**Objective 2.3:** Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.

**Policy 2.3.2:** Promote and facilitate the reduction of water consumption in new and existing housing.

**Policy 2.3.3:** Promote and facilitate reduction of energy consumption in new and existing housing.

**Policy 2.3.4:** Promote and facilitate reduction of waste in construction and building operations.

**Objective 2.4:** Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.

**Policy 2.4.1:** Promote preservation of neighborhood character in balance with facilitating new development.

**Policy 2.4.2:** Develop and implement design standards that promote quality residential development.

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**Would the Project Conflict?**

**No Conflict.** The Project would ensure sustainable building design, including minimizing the use of non-renewable resources, reduction of water and energy consumption and waste, through compliance with the 2016 CalGreen Code), Los Angeles Green Building Code, Los Angeles Building Code, Planning and Zoning Code, and voluntary compliance with USGBC LEED or equivalent standards. Design features of the Project would include the use of energy efficient glass/window areas for ventilation and daylight accessibility; landscaping of podium and roof decks (Level 4 and 20) with drought tolerant plants and a low water use landscape system; well-lit pedestrian areas; common open space for residents, including an outdoor courtyard, rooftop garden space, and outdoor dining, pool deck, and fitness center that would be shared with hotel guests. As described in Project Design Feature PDF-AQ-1, the Project would implement a construction waste management plan and reduce indoor water use by a minimum of 20 percent or more. The Project would include a dedicated on-site recycling area.

**No Conflict.** Consistency with these policies would ensure that new development would avoid substantially degrading the visual character or quality of a site or its surroundings. The Project would be consistent with these policies in that it would locate its lower component, Building 2, in proximity to the existing single-family neighborhood. This building would have a maximum height relative to the lowest point on Vista Del Mar of 47 feet to the top of the roof. This building would maintain a 15-foot setback from the sidewalk along Vista Del Mar Avenue and the southern property line to support compatibility in scale and character with the adjacent residential neighborhood. As such, the Project is designed to respect and preserve the adjacent residential neighborhood, promotes quality residential development, and would not substantially degrade the adjacent residential uses.

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SOURCE: ESA, 2019.

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**TABLE IV.H-4**  
**COMPARISON OF THE PROJECT TO PROVISIONS OF THE HOLLYWOOD COMMUNITY PLAN**

Plan Objectives	Would the Project Conflict?
Objectives	
<p>3. To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.</p> <p>To encourage the preservation and enhancement of the varied and distinctive residential character of the Community, and to protect lower density housing from the scattered intrusion of apartments.</p>	<p><b>No Conflict.</b> The objective to provide a range of housing in a manner that preserves and enhances the varied and distinctive residential character of the Community would avoid substantially degrading the visual character or quality of a site or its surroundings. The Project is consistent with this policy and, as such, it would not substantially degrade its surroundings. Building 1, which is 20 stories and is located within the Regional Center Commercial designation, would be consistent with the more intense mixed-use development along Yucca Street and Argyle Avenue. To enhance compatibility with the adjacent residential neighborhood, Building 2, is designed to be compatible in scale and character with the adjacent residential neighborhood. Building 2 would be three stories of residential uses over parking and would maintain a maximum height of 47 feet high to the top of the roof as viewed from Vista Del Mar Avenue. The 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue.</p>
<p>5. To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.</p>	<p><b>No Conflict.</b> The Project would provide all necessary infrastructure improvements to meet Project-related demands, and would also provide private open space recreational facilities on the Project Site to meet the needs of on-site residents and hotel guests. As analyzed in Section IV.K, <i>Public Services</i>, and IV.N, <i>Utilities</i>, the Project's impacts to public services and utilities would be less than significant with implementation of the identified mitigation measures, where necessary. Public services and utilities in the Project Site vicinity are provided by a number of utility and service providers. These providers offer short and long term planning for the provision of services based on data from numerous sources, and provide new facilities as appropriate. Furthermore, the agencies individually monitor supply and demand and update their infrastructure accordingly.</p>
<p>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.</p>	<p><b>No Conflict.</b> The Project would increase population density in proximity to the Metro Red Line, other regional Metro bus lines, and the LADOT DASH lines. Furthermore, the Project would include bicycle parking spaces for Project residents, employees, and visitors. Refer to Section IV.L, <i>Transportation</i>, of this Draft EIR for a discussion of potential impacts related to vehicle miles travelled and alternative modes of transportation.</p>

Plan Objectives	Would the Project Conflict?
<p>7. 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.</p>	<p><b>No Conflict.</b> The Project would not adversely affect any open space areas or natural features. The existing setting is urban and densely populated. The Project Site is not located in a mountainous area. A discussion of view resources in the Project Site vicinity and an analysis of the Project's impacts on views are provided in Section IV.A, <i>Aesthetics</i>, of this Draft EIR. As stated therein for informational purposes only, the Project's impacts on views would be less than significant.</p>

SOURCE: ESA, 2019.

(e) *Hollywood Redevelopment Project and Plan*

The Hollywood Redevelopment Project and Plan were initiated pursuant to State laws, and carried out under the authority of the 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. Subsequent State legislation (AB1x-26) dissolved the CRA. Pursuant to the provisions of AB1x-26, CRA/LA was formed as the Designated Local Authority, and as a result, and the Governor appointed its three-member board. CRA/LA was then tasked with implementing and enforcing the requirements of the Hollywood Redevelopment Plan. However, transfer of all additional land use controls under Redevelopment Plans to the City is in process. Specifically, in August 2014, the Planning and Land Management Committee of the City Council requested the City Attorney to prepare an ordinance to carry out the transfer (Council File 13-1482-S1). 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.<sup>41</sup>

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 provisions of the Redevelopment Plan provide guidelines for development in the designated Hollywood Redevelopment area in which the Project is located that would protect the environment. The most notable provisions of the 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 **Table IV.H-5, Consistency of the Project with Applicable Sections of the Hollywood Redevelopment Plan.**

<sup>41</sup> CRA/LA, A Designated Local Authority, Memorandum to Governing Board – Clarification Regarding Discretionary Land Use Actions, June 21, 2012. Available at: [http://www.crala.org/internet-site/Meetings/Board\\_Agenda\\_2012/upload/June\\_21\\_2012\\_Item\\_6.pdf](http://www.crala.org/internet-site/Meetings/Board_Agenda_2012/upload/June_21_2012_Item_6.pdf). Accessed September 19, 2019.



**TABLE IV.H-5**  
**CONSISTENCY OF THE PROJECT WITH APPLICABLE SECTIONS OF THE HOLLYWOOD**  
**REDEVELOPMENT PLAN**

Plan Provision	Would the Project Conflict?
<b>Section 300. Redevelopment Plan Goals</b>	
<p>5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as:</p> <ul style="list-style-type: none"> <li>a. adopting land use standards;</li> <li>b. promoting 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 and concealment of mechanical appurtenances;</li> <li>c. promoting landscape criteria and planting programs to ensure additional green space;</li> <li>d. encouraging maintenance of the built environment;</li> <li>e. promoting sign and billboard standards;</li> <li>f. coordinating the provision of high quality public improvements;</li> <li>g. promoting rehabilitation and restoration guidelines;</li> <li>h. integrate public safety concerns into planning efforts.</li> </ul>	<p><b>No Conflict.</b> The Project would replace existing residential uses with a new mixed-use development that is consistent with type and scale of development in the plan area and applicable design standards. Building 1 would feature a modern architectural style, including a strong physical and visual base for the tower, as well as a distinct horizontal element at the base to create a complementary element to the tower. Building 2 would be lower in height and designed in a Craftsman style to complement the historic homes in the adjacent residential neighborhood. It would also maintain the 15-foot landscaped setback along Vista Del Mar Avenue, consistent with existing front yard setbacks in the adjacent neighborhood. Landscaping would be planted in the public realm along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue; vines would be planted long the exposed south wall of the parking podium; and the tower setback and at the roof deck of Building 2, which would be visible from the adjacent streets, would be landscaped. The Project would promote a safe pedestrian environment by activating the ground floor of the development with the hotel and residential lobbies and with new commercial uses. New street lighting along Yucca Street would also improve pedestrian safety compared to existing conditions. Existing public infrastructure would remain, although sidewalks would be upgraded and existing above-grade utilities would be relocated underground. Policies regarding billboards and rehabilitation of existing structures would not be applicable.</p>
<p>10) Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.</p>	<p><b>No Conflict.</b> The Project would redevelop the Project Site with a mix of multi-family housing, hotel, retail and restaurant uses that implements the purpose of the Hollywood Regional Center designation. The conceptual design of Building 1 is modern, featuring a mix of glass and solid panel clad exterior walls for the residential and hotel components and the parking podium. The conceptual design of Building 2 is a contemporary adaption of the Craftsman style. Its scale and height at three-stories, stepped massing with sloped hip roofs, natural materials, muted color scheme and details are designed to be respectful of the single-family homes located in the Vista Del Mar Carlos Historic District. The Project would incorporate the 15-foot setback on the East Parcel to be more compatible with the adjacent residential neighborhood. The Project would provide landscaping and new sidewalks along</p>

Plan Provision	Would the Project Conflict?
12) 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.	<p>Yucca Street, Argyle Avenue, and Vista Del Mar Avenue. In addition, the Project would provide 12,570 square feet of new commercial and restaurant uses, including café seating, along Yucca Street and Argyle Avenue, activating this area and improving the pedestrian experience. The Project would include a landscape plan, enhancements to the sidewalks fronting the Project Site, and provide for the undergrounding or screening of utilities.</p> <p><b>No Conflict.</b> The Project Site is located within close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and LADOT DASH lines and would include bicycle facilities for Project residents, visitors, and employees and upgraded sidewalks, improved lighting and landscaping to attract and encourage pedestrians.</p>
14) Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.	<p><b>No Conflict.</b> The Project would provide on-site recreational and open space uses for residents and hotel guests. The Project would improve pedestrian facilities on the Project Site with the provision of landscaping and upgraded sidewalks along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue. Resident-only facilities include outdoor courtyard space on the Podium Level, roof gardens, rear yard setback space, and private balconies. Shared facilities include a pool deck and fitness center.</p>
SOURCE: ESA, 2019.	

In summary as presented in Table IV.H-5, the Project would be consistent with the applicable Hollywood Redevelopment Plan goals related to land use and design, sound residential neighborhoods, circulation, and open space/recreation. The Project would be consistent with the Regional Center Commercial land use designation of the Redevelopment Plan Map by providing a mixed use residential, hotel and commercial/restaurant development (Building 1) within the West and Center Parcels that is compatible with similar mixed-use development to the west and south. The Project would be consistent with the Medium Density Residential designation by providing a three-story residential use over parking in the east portion of the Project Site. Building 2 parking would be subterranean near Yucca Street, with one level of exposed parking in the south or lowest part of the Vista Del Mar frontage. Maximum height relative to the lowest point on Vista Del Mar would be 47 feet to the top of the roof. Building 2 is designed to be more compatible in scale and character with the adjacent residential neighborhood. The 15-foot setback from the Vista Del Mar sidewalk would be maintained for consistency with existing front yards along Vista Del Mar Avenue. Building 2 would further provide a setback and buffer between adjacent residential neighborhood on Vista Del Mar Avenue and Building 1's 20-story tower. The Project would have an overall FAR of 6.6:1, which would exceed the maximum FAR of 6:1 set forth under the Hollywood Redevelopment

Plan. However, the increase in FAR beyond 6:1 is allowed by the LAMC, subject to the City's findings that the Project would be consistent with the intent of the Community Plan and Redevelopment Plan and would be compatible with and would not degrade adjacent properties.<sup>42</sup> With such approvals and findings, impacts with respect to this Plan would be less than significant, and the Project would be consistent with the goals set forth in the Redevelopment Plan as analyzed in Table IV.H-5, above.

(f) *City of Los Angeles Municipal Code (LAMC)*

As shown on Figure IV.H-2, the Project Site is comprised of the West Parcel, Center Parcel, and East Parcel (five lots).

The West Parcel is zoned C4-2D-SN. The C4 indicates commercial uses and permits a variety of uses including multi-family residential, hotel, retail, and restaurant as described in LAMC Section 12.16. As stated in LAMC Section 12.22.A.18, when designated in a Regional Center, the C4 zone includes R5, multiple dwelling uses (with a corresponding density of 200 square feet of lot area per dwelling unit). The "2" indicates Height District 2, unlimited building height with a maximum FAR of 6:1. The "D" indicates a Development Limitation of 2:1 FAR, with the following exceptions: Approval of the Project as being consistent with the provisions of the Hollywood Redevelopment Plan; Execution of a Disposition and Development Agreement or Owner Participation Agreement by the CRA Board; and Approval by the Planning Commission, or City Council on Appeal.<sup>43, 44</sup> The "SN" designates a Sign District, that provides additional regulations for the types of signs permitted along Hollywood Boulevard under Ordinance No. 181340.

The Center Parcel is zoned R4-2D. The R4 indicates multiple dwelling uses, and also includes single-family, group homes, schools, and museums as described in LAMC Section 12.11. The R4 Zone permits a density of 400 square feet of lot area per dwelling unit. The "2" indicates Height District 2, unlimited building height with a maximum FAR of 6:1 and the "D" limits the FAR to 2:1. The current R4 zoning is not consistent with the Regional Center Commercial General Plan land use designation because the R4 Zone does not permit commercial uses.

The East Parcel is zoned [Q] R3-1XL. The R3 indicates multiple dwelling uses, and also includes single-family, group homes, and senior/assisted living care housing as described

<sup>42</sup> LAMC § 12.24-F. Available at: [https://planning.lacity.org/zone\\_code/2000zc.062201.old/2000pdf/17cuo\\_21zaf.pdf](https://planning.lacity.org/zone_code/2000zc.062201.old/2000pdf/17cuo_21zaf.pdf). Accessed September 2019.

<sup>43</sup> Development Limitation pursuant to Ordinance No. 165662; May 7, 1990. Reference document available at: [https://planning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20F\\_Proposed%20Q%20Qualified%20Condition%20and%20D%20Development%20Limitation%20Change%20Matrix%20-%20Approved%20by%20CPC.pdf](https://planning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20F_Proposed%20Q%20Qualified%20Condition%20and%20D%20Development%20Limitation%20Change%20Matrix%20-%20Approved%20by%20CPC.pdf). Accessed August 29, 2019.

<sup>44</sup> As discussed previously under the Regulatory Framework subheading regarding the Hollywood Redevelopment Project/Plan, responsibilities formerly assigned to the Community Redevelopment Agency are currently being transferred to the City of Los Angeles Planning Department. Approval of the project will require a finding of consistency with the Hollywood Redevelopment Plan.

in LAMC Section 12.10. The R3 Zone permits a density of 800 square feet of lot area per dwelling unit. The “1XL” indicates Height District 1XL, which limits building height to 30 feet with a maximum FAR of 3:1. The “[Q]” portion of the zoning (or “Qualified Conditions”) is more restrictive than the underlying zoning and limits residential density to a maximum of one dwelling unit for each 1,200 square feet of lot area.<sup>45</sup>

The Project would require a height district change for the West Parcel to remove the Development Limitation (“D”) of 2:1 FAR. The Project would require a zone change and a height district change for the Center Parcel from R4-2D to C2-2 to be consistent with the existing Regional Center Commercial General Plan land use designation and allow commercial uses, and to remove the Development Limitation (D) of 2:1 FAR. For the East Parcel, the Project would require a zone change for removal of the [Q] condition, which limits residential density to a maximum of one dwelling unit for each 1,200 square feet of lot area to allow density of one unit per 974 square feet (45 units per acre). As further discussed in Section IV.A, *Aesthetics*, of this Draft EIR, the Project would be consistent with the Sign District with the incorporation of PDF-AES-2, which would ensure uniform signage on the West and Center Parcels.

**Table IV.H-6, *Comparison of the Project to Applicable Land Use Regulations of the LAMC***, evaluates the consistency of the Project with applicable policies of the LAMC. As discussed in Table IV.H-6, the Project would be consistent with the provisions of the LAMC zone and height district changes, conditional uses, and Site Plan Review, subject to certain conditions and findings. With the approval of the requested entitlements the Project would be consistent with the density, FAR, height, and uses within the C4-2-SN, C4-2, and R3-2 zones. The Project would be consistent with open space, setback, and landscaping requirements of the LAMC.

The proposed mixed-use development on the West and Center Parcels would be consistent with the Regional Center Commercial General Plan land use designation, which encourages concentrating development near public transportation and the residential development on the East Parcel would be consistent with the Medium Density General Plan land use designation. The Project would be designed so that its taller component would be located near Argyle Avenue and Yucca Street, near similar high rise mixed-use development, and its lower component would be all residential, reduced in height to three stories over parking, and would incorporate deep setbacks along Vista Del Mar Avenue and the southern property line to be compatible with the adjacent residential neighborhood. The Project would provide ground level commercial/restaurant uses, landscaping, and upgraded sidewalks to enhance the pedestrian environment on Yucca Street.

<sup>45</sup> Ordinance No. 165662. Reference available at: [https://planning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20F\\_Proposed%20Q%20Qualified%20Condition%20and%20D%20Development%20Limitation%20Change%20Matrix%20-%20Approved%20by%20CPC.pdf](https://planning.lacity.org/cpu/hollywood/February172012Exhibits/Exhibit%20F_Proposed%20Q%20Qualified%20Condition%20and%20D%20Development%20Limitation%20Change%20Matrix%20-%20Approved%20by%20CPC.pdf). Accessed August 29, 2019.

**TABLE IV.H-6**  
**COMPARISON OF THE PROJECT TO APPLICABLE LAND USE REGULATIONS OF THE LAMC**

<b>Code Section</b>	<b>Code Provision</b>	<b>Would the Project Conflict?</b>
Section 12.16.A (Permitted Uses in the C4 Zone) and Section 12.22.A.18(a) (Development Combining Residential and Commercial Uses)	Permitted uses include any uses permitted in the "C2" Commercial Zone, including multi-family residential, hotel, retail, and restaurant uses. Permitted uses when designated in a Regional Center also include any uses permitted in the "R5" Multiple Dwelling Zone, including any uses in the "R4" Multiple Dwelling Zone, such as multi-family residential, group homes, and hotels.	<b>No Conflict.</b> The proposed multi-family, hotel, and commercial/restaurant uses on the West Parcel are consistent with the C2 zoning designation. The Project would require a zone change on the Center Parcel from R4 to C2 to permit the proposed commercial uses and to be consistent with the underlying Regional Center Commercial land use designation of the Hollywood Community Plan. With the zone change, the Project's uses would be consistent with the LAMC.
Section 12.11.A (Permitted Uses in the R4 Zone)	Permitted uses include any uses permitted in the "R3" Multiple Dwelling Zone, including multiple dwellings and accessory living quarters, as well as hotels, fraternities, schools, and museums. Commercial uses are not permitted.	<b>No Conflict.</b> Residential uses proposed on the East Parcel are consistent with residential uses permitted in the R3 (Medium Density) zone.
Section 12.10.A (Permitted Uses in the R3 Zone)	Permitted uses include any uses permitted in the "R2" Two-family Zone, including multiple dwelling uses, single family, group homes, and senior/assisted living car housing.	<b>No Conflict.</b> Residential uses proposed on the East Parcel are consistent with residential uses permitted in the R3 (Medium Density) zone.
Section 12.16.C (Setbacks in the C4 Zone)	<b>Front Yard</b> – Not required. <b>Side and Rear Yards</b> – Not required for buildings erected and used exclusively for commercial purposes. For all portions of buildings erected and used for residential purposes, side, and rear yards conforming to the requirements of the R4 Zone shall be provided and maintained at the floor level of the first story used for residential purposes.	<b>No Conflict.</b> Building 1 on the West and Center Parcels would not be required to provide front and side yard in C4 zone. The Project would provide a 16-foot setback from the south property line.

Code Section	Code Provision	Would the Project Conflict?
Section 12.10.C (Setbacks in the R3 Zone)	<p><b>Front Yard</b> – Not less than 15 feet.</p> <p><b>Side Yard</b> – For a building more than two stories in height, one foot shall be added to the width of such side yard for each additional story above the second story, but in no event shall a side yard of more than 16 feet in width be required.</p> <p><b>Rear Yard</b> – There shall be a rear yard of not less than 15 feet in depth.</p>	<p><b>No Conflict:</b> Building 2 in the East Parcel (R3 zone) would provide a 15-foot-front yard setback and 6-foot side yard setbacks (consistent with a three-story building). Because the proposed building is within a larger common property, the rear yard setback (the setback between Building 1 and Building 2) would not be applicable.</p>
Section 12.16.C.3 (Lot Area in the C4 Zone)	C4 – Same as R4.	<p><b>No Conflict.</b> The West Parcel (C4 within a Regional Center) currently permits a minimum lot area per dwelling unit of 200 square feet (98 units); the Center Parcel (R4) currently permits a minimum lot area of 400 square feet per dwelling unit (49 units); and the East Parcel currently permits a minimum lot area of 1,200 square feet per dwelling unit (9 units) for a total of 156 units. The Project would require a zone change on the Center Parcel from R4 to C2 to be consistent with the underlying Regional Center Commercial General Plan land use designation which would permit a minimum lot area of 200 square feet per dwelling unit or 98 units (total of 196 units). The Project would also require a zone change to remove the [Q] Condition on the East Parcel to permit a minimum lot area of 800 square feet per dwelling unit or 14 units. With the approval of the requested zone changes, a total of 210 dwelling units would be permitted on the Project Site.</p>
Section 12.11.C.4 (Lot Area in the R4 Zone)	C4 – If within a designated Regional Center the same as R5.	
Section 12.22.A.18 (Development Combining Residential and Commercial Uses)	R5 – Every lot shall have a minimum lot area per dwelling unit of 200 square feet.	
Section 12.12.C.4 (Lot Area in the R5 Zone)	R4 – Every lot shall have a minimum lot area per dwelling unit of 400 square feet.	
Section 12.10.C.4 (Lot Area in the R3 Zone)	R3 – Every lot shall have a minimum lot area per dwelling unit of 800 square feet.	
[Q] Condition (Ordinance No. 165662)	The [Q] Condition limits residential density in the R3 zone to a minimum lot area per dwelling unit of 1,200 square feet.	

Code Section	Code Provision	Would the Project Conflict?
<p>Section 12.21.1 (Height of Buildings or Structures)</p> <p>Section 12.21.3 (Height of Buildings or Structures in Community Redevelopment Plan Areas)</p>	<p>No Height Limits in Height District 2 within the C4 and R4 Zone and total FAR not to exceed 6:1.</p> <p>Within the R3 Zone buildings for residential uses are limited to an FAR of 6:1.</p> <p>Within the R3 Zone, Height District 1XL limits building height to 30 feet with a maximum FAR of 3:1.</p>	<p><b>No Conflict.</b> The West and Center Parcels are currently zoned C4-2D and R4-2D, respectively, which indicates Height District 2 and a Development Limitation of 2:1 FAR. The East Parcel are currently zoned [Q] R3-1XL. The 1XL limits building height to 30 feet with a maximum FAR of 3:1. The Redevelopment Plan limits the FAR within a Regional Center Commercial Density to 4.5:1 and not to exceed 6.1, except under certain circumstances.</p> <p>The Project would require findings of consistency with the Hollywood Community Plan and objectives of the Hollywood Redevelopment Plan Section 506.2.3, related to an increase in FAR. City findings must include a determination that the Project would be compatible with and would not degrade adjacent properties. With these findings, the Project would be consistent with the LAMC.</p>
Section 12.21.G.2 (Usable Open Space)	<p>New construction shall have 100 square feet of usable open space for each unit having less than three habitable rooms; 125 square feet of usable open space for each unit having three habitable rooms; and 175 square feet of usable open space for each unit having more than three habitable rooms. Recreation rooms shall not quality for more than 25% of the total required usable open space. Private open space shall contain a minimum of 50 square feet and have no horizontal dimension less than six feet or vertical clearance less than eight feet.</p>	<p><b>No Conflict.</b> Building 1's 99 one-bedroom units would require 9,900 square feet of usable open space, the 88 two-bedroom units would require 11,000 square feet of usable open space, and the 10 suite units would require 1,750 square feet of usable open space for a total requirement of 22,650 square feet of usable open space. Building 1 would meet this requirement with the 10,610 square feet of podium open space, 3,740 square feet of rooftop garden, and 8,500 square feet in private balconies, for a total of 22,850 square feet of open space. Building 2 would be required to provide 1,500 square feet of open space. This requirement would be met with the inclusion of 375 square feet of amenities (less than 25% of the total), 875 square feet of rooftop garden, and 250 square feet of balconies for a total of 1,500 square feet of open space.</p>

Code Section	Code Provision	Would the Project Conflict?
Section 12.21.G.2(a)(3) (Landscaped Common Open Space)	<p>A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees.</p> <p>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.</p>	<p><b>No Conflict.</b> Landscaping would be provided at a minimum of 25 percent of the common open space. Also, approximately 17 street trees would be planted along the public sidewalks, in addition to trees and shrubs in the Podium and rooftop gardens. Refer to Figures II-13 through II-15 for illustrations of the Project's proposed landscaping.</p>

SOURCE: ESA, 2019.

In addition, the current residents at the Project Site would be eligible for assistance under the City of Los Angeles Relocation/Demolition Monitoring Program pursuant to Ordinance 178632 as codified in LAMC Sections 151.00 *et seq.* (RSO), California Government Code Sections 7060 *et seq.* ("Ellis Act), and LAMC Section 47.07(Tenant Relocation Assistance). Relocation fees are outlined in LAMC Sections 151.0.G,151.06.D, and Section 47.07. As permitted under the Ellis Act, when withdrawing units subject to the RSO from the rental market, the RSO requires landlords to provide tenants with 120-day notice, or one year if the tenant lives in the units for at least one year and are more than 62 years of age or disabled. The above referenced provisions would provide adequate notification and financial assistance to mitigate temporary displaced residents. The Project would follow all applicable RSO and Ellis Act requirements when relocating residences from the Project Site.

The RSO also imposes replacement unit requirements where RSO units are replaced.<sup>46</sup> The Project proposes to provide 100 percent of its 210 residential dwelling units as RSO units, which complies with the requirements of the RSO. Accordingly, the Project will increase the number of RSO units available in the Hollywood area and in the City. In addition, the Applicant retained a relocation liaison in mid-2016 that has been available on the Project Site to discuss relocation options with existing tenants.

<sup>46</sup> LAMC §151.28. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/J203.pdf>. Accessed September 2019.



Based on the above, the Project would be consistent with applicable land use regulations of the LAMC.

(g) *2010 Bicycle Plan and Mobility Plan 2035*

The Project would be subject to provisions of the City's 2010 Bicycle Plan. Key objectives of the Bicycle Plan, which have been folded into the Mobility Plan, include the following: develop a comprehensive commuter and recreational bikeway system for the City of Los Angeles; encourage and facilitate bicycle riding as an important mode of personal transportation as well as a pleasant source of outdoor exercise; and make bicycling a safer activity for both commuting and recreation. A stated policy of the Bicycle Plan is to reduce automobile trips and greenhouse gas emissions by making five percent of all daily trips and three percent of commute trips bicycle trips by 2020.

The Bicycle Plan identifies Yucca Street, Argyle Avenue and Vista Del Mar Avenue adjacent to the Project Site as Bicycle Friendly Streets (BFS). A BFS is a Class III facility introduced by the Bicycle Plan that should include at least two engineering street calming treatments in addition to signage and shared lane markings. By introducing signage, pavement markings, bulb-outs or even traffic diverters, a BFS creates a pleasant and safe environment for relaxed riding, especially for bicyclists more sensitive to motor vehicle traffic. The Project would provide 258 bicycle parking spaces, including 232 spaces for residential uses, 14 spaces for hotel uses, and 12 spaces for commercial/restaurant uses, which is consistent with LAMC requirements as discussed in Section IV.L, *Transportation*. Bicycle parking spaces would be accommodated in P1 and Ground Level of the parking structure and along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue. Project implementation would not remove or interfere with the existing designations of Yucca Street, Argyle Avenue or Vista Del Mar adjacent to the Project Site as designated BFS. As the Project would include facilities to support bicycling and would not adversely affect the planned bicycle network, the Project would be consistent with the provisions of the Bicycle Plan. An analysis of applicable Mobility Element policies related to is provided in Section IV.L, *Transportation*.

(h) *ZI No. 2427 - Freeway Adjacent Advisory Notice*

(i) *Health Risk Assessment for Freeway Adjacent Properties*

The City of Los Angeles Freeway-Adjacent Advisory Notice (ZI No. 2427) recommends the consideration of air quality health risks for projects located within 1,000 feet of a freeway. ZI No. 2427 is intended to allow planners and project applicants to determine whether sensitive uses would be exposed to significant levels of freeway TACs. An HRA was prepared for the Project for informational purposes, to assess the consistency of the proposed siting of new residential land uses in proximity to the Hollywood freeway, which is a substantial existing source of toxic air contaminant (TAC emissions). The Freeway HRA Technical Appendix, included in Appendix C-2 of this Draft EIR, evaluates the chronic cancer risk and health effects of TAC emissions associated with diesel-powered

trucks emitting diesel particulate matter (DPM) along the Hollywood Freeway, in proximity to potential residents of the Project. A discussion of specific TAC emissions health thresholds and methodologies for determining emission levels at the Project Site are provided in the HRA Technical Appendix in Appendix C-2.

(ii) *Hollywood Freeway TAC Emissions*

The Project would place future residents, visitors, and employees in an area that is subject to increased levels of TAC emissions associated with the Hollywood Freeway, in particular from diesel-fueled trucks. As such, the Project may expose future occupants to adverse health effects associated with exposure to unhealthful ambient air quality.

TAC emissions from the freeway are generated through combustion of fuel (primarily diesel) which affects ambient air quality throughout the region. TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TAC emissions are regulated at the regional, state, and federal level. Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TAC emissions (based on the statewide average). According to CARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs. For modeling purposes, receptors were located on the Project Site based on the conservative assumption that residential receptors could be located anywhere on the Site. The dispersion modeling took into account variable traffic volumes at different times of day.

Vehicle traffic and speed data for the Hollywood Freeway was obtained from the Caltrans PeMS database for the Hollywood Freeway mainline. Traffic count data was provided by the Caltrans Traffic Census Program and vehicle traffic data for on-and off-ramps was obtained from Caltrans PeMS. On- and off-ramp vehicle speeds were set at 15 miles per hour, which provides for a conservative (i.e., health protective) analysis since emissions factors are relatively high at this speed. Hourly traffic data was also obtained to account for temporal variation of traffic flow. An annual traffic growth rate of one percent was applied to account for future traffic flow.

(iii) *On-Site Cancer Risk Impacts*

**Table IV.H-7, Summary of Carcinogenic Risks for On-Site Sensitive Receptors**, below, summarizes the carcinogenic risk for representative receptors located throughout the Project Site. For carcinogenic exposures, the cancer risk from DPM emissions for the Project Site resulted in a maximum carcinogenic risk of 8.07 per one million for the 30-year residential exposure scenario with windows open, and 4.04 per one million for the 30-year residential exposure scenario with air filters with a Minimum Efficiency Reporting Value (MERV) of 13 and windows closed. This scenario is based on highly conservative

exposure factors including the assumption that childhood age receptors have a fraction of time at home (FAH) parameter of 1.0 and a 30-year, 24-hours-per-day, seven-days-per-week exposure. As discussed in Section IV.B, *Air Quality*, of this EIR, the SCAQMD threshold for determining a significant cancer risk is 10 per one million. The 30-year exposure duration is a recommended residential exposure under the SCAQMD guidelines. Cancer risk for on-site receptors which are farther away from the freeway would be less than 8.07 per one million with windows open, and less than 4.07 per one million with MERV 13 filters and windows closed. It should be noted that the calculated cancer risk assumes mechanical filtration and exposure with the windows open condition. The current City of Los Angeles Building Code requires mechanical filtration with a Minimum Efficiency Reporting Value (MERV) of 13 or higher, based on the American Society of Heating, Refrigeration and Air-Conditioning Engineers (ASHRAE) Standard 52.2, for new residential units within 1,000 feet of a freeway. 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 micrometers ( $\mu\text{m}$ ), 1.0 to 3.0  $\mu\text{m}$ , and 3.0 to 10.0  $\mu\text{m}$ , respectively.<sup>47</sup> Thus, MERV 13 filters would reduce typical indoor PM10 and PM2.5 concentrations by at least 50 percent, with increasing reductions approaching 85 and 90 percent for particles with an aerodynamic diameter greater than 1.0  $\mu\text{m}$ . Therefore, actual cancer risk impacts to on-site residents would be those reported herein with windows closed.

**TABLE IV.H-7**  
**SUMMARY OF CARCINOGENIC RISKS FOR ON-SITE SENSITIVE RECEPTORS**

<b>Risk Scenario</b>	<b>Carcinogenic Risk Per One Million <sup>a</sup></b>	<b>Threshold Exceedance</b>
Maximum Exposed Individual (MEI) (closest to freeway)	8.07	No
Maximum Exposed Individual (MEI) with MERV 13 Filters and Windows Closed <sup>b</sup> (closest to freeway)	4.04	No

See calculation worksheets presented in Appendix C-2.

<sup>a</sup> The significance threshold is 10 per million.

<sup>b</sup> MERV 13 filters have reduction efficiencies of 50, 85, and 90 percent for particles with diameter ranges of 0.3 to 1.0 micrometers ( $\mu\text{m}$ ), 1.0 to 3.0  $\mu\text{m}$ , and 3.0 to 10.0  $\mu\text{m}$ , respectively. A 50 percent reduction was applied to the risk value from MERV 13 filters with windows closed.

SOURCE: ESA, 2019.

The HRA worksheets contained in Appendix C-2 provide a detailed breakdown of these calculations. In summary, since on-site residential uses would be provided an adequate health-based separation distance from the freeway, the Project Site's worst-case location

<sup>47</sup> American Society of Heating, Refrigerating and Air-Conditioning Engineers, Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size, 2015 Supplement, [https://www.ashrae.org/File%20Library/Technical%20Resources/Standards%20and%20Guidelines/Standards%20Addenda/52\\_2\\_2012\\_2015Supplement.pdf](https://www.ashrae.org/File%20Library/Technical%20Resources/Standards%20and%20Guidelines/Standards%20Addenda/52_2_2012_2015Supplement.pdf). Accessed March 2018.

would not be exposed to cancer risk in excess of the SCAQMD significance threshold of 10 per one million. Because an HRA was performed in accordance with the requirements of ZI No. 2427, the Project would be consistent with this regulation.

(iv) *On-Site Non-Cancer Chronic Health Impacts*

**Table IV.H-8, Summary of Non-Cancer Chronic Risks for On-Site Sensitive Receptors,** summarizes the carcinogenic risk for representative receptors located throughout the Project Site. A Hazard Index of less than 1.0 means that the maximum impacted sensitive receptor would be exposed to TAC concentrations at a level in which adverse non-cancer health effects would not be known or expected to occur. As discussed in Section IV.B of this Draft EIR, a hazard index equal to or greater than 1.0 represents a significant chronic health hazard per the SCAQMD. For non-cancer chronic (annual) exposures, the maximum chronic (annual) health impact from vehicle emissions from the Hollywood Freeway to future Project Site residents would be a Hazard Index of approximately 0.00358 with windows open, and 0.00179 with MERV 13 filters with windows closed (respiratory irritant) compared to the threshold of 1.0. As a result, on-site residential uses would be provided an adequate health-based separation distance from the freeway and non-cancer impacts would not exceed the SCAQMD threshold for chronic health risk. Because an HRA was performed in accordance with the requirements of ZI No. 2427, the Project would be consistent with this regulation.

**TABLE IV.H-8  
SUMMARY OF NON-CANCER RISKS FOR ON-SITE SENSITIVE RECEPTORS**

<b>Risk Scenario</b>	<b>Chronic Hazard Index <sup>a</sup></b>	<b>Threshold Exceedance</b>
Maximum Exposed Individual (MEI) (closest to freeway)	0.00358 (respiratory irritant)	No
Maximum Exposed Individual (MEI) with MERV 13 Filters and Windows Closed <sup>b</sup> (closest to freeway)	0.00179 (respiratory irritant)	No

See calculation worksheets presented in Appendix C-2.

<sup>a</sup> The significance threshold is 1.0.

<sup>b</sup> MERV 13 filters have reduction efficiencies of 50, 85, and 90 percent for particles with diameter ranges of 0.3 to 1.0 micrometers (µm), 1.0 to 3.0 µm, and 3.0 to 10.0 µm, respectively. A 50 percent reduction was applied to the Hazard Index value from MERV 13 filters with windows closed.

SOURCE: ESA, 2019

## (2) Consistency with Regional Plans

### (a) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and Compass Growth Vision

SCAG's 2016 RTP/SCS incorporates several policies that are applicable to the Project. These SCAG policies are discussed below. **Table IV.H-9, Consistency of the Project with Applicable Policies of the 2016 Regional Transportation Plan/Sustainable Communities Strategy**, provides a detailed analysis of the Project's consistency with applicable 2016 RTP/SCS policies in a side-by-side comparison.

In summary, based on the analysis presented in Table IV.H-9, the Project would be consistent with the applicable 2016 RTP/SCS policies. The Project would be developed on a Project Site located within an identified HQTa in an urban area near the Metro Red Line station, numerous regional Metro Bus lines, and local LADOT DASH lines. Furthermore, the Project would provide high density residential, hotel, and commercial/restaurant development in a mixed-use area providing opportunities to carry out a large range of activity with pedestrian accessibility. As shown in Table IV.H-9, the Project would be consistent with policies to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, maximize the productivity of the transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation. Therefore, the Project is consistent with the 2016 RTP/SCS.

**TABLE IV.H-9**  
**CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE 2016 REGIONAL**  
**TRANSPORTATION PLAN/ SUSTAINABLE COMMUNITIES STRATEGY**

Policy	Would the Project Conflict?
Maximize mobility and accessibility for all people and goods in the region.	<b>No Conflict.</b> Although this goal applies at a regional level, the Project would be developed on a Project Site within an identified HQTa within an existing urbanized area with an established network of roads and freeways that provides local and regional access to the surrounding areas. In addition, the location of the Metro Red Line station and regional bus services, as well as the regional freeway system, would maximize mobility and accessibility to the Project Site. Given the Project's location in proximity to a variety of transportation options, the Project would maximize mobility and accessibility by providing opportunities for walking and biking and opportunities for the use of alternative modes of transportation, including convenient access to public transit. The increased use of these alternative modes of transportation would reduce dependency on the automobile and reduce the generation of respective air quality, GHG, energy demand, and mobile source noise effects on the environment that result from automobile use.

Policy	Would the Project Conflict?
Ensure travel safety and reliability for all people and goods in the region.	<p><b>No Conflict.</b> The Project is designed to minimize pedestrian/vehicle and bicycle/vehicle conflicts associated with vehicles entering and exiting the Project at controlled access points. As a result of the Project's location, Project residents and guests would have pedestrian access to a large range of goods and services as well as employment opportunities, helping to reduce demand on the travel system. Project residents, visitors, and employees would have a range of transportation alternatives available to meet their transit needs, as described with respect to the immediately preceding policy.</p>
Preserve and ensure a sustainable regional transportation system.	<p><b>No Conflict.</b> The proximity of the Project to alternative transit modes, including regional rail and bus line services, would support the region's transportation investment and the sustainability of the regional transportation system. The introduction of high density residential units, representing an increase of 166 residential units (210 proposed residential units – 44 existing residential units), new hotel rooms, sidewalk restaurant, retail uses, new pedestrian lighting, sidewalk improvements, new street trees, and bicycle parking would enhance the pedestrian environment and encourage walking and bicycling to the nearby Hollywood/Vine Metro station by on-site and neighboring residents and hotel guests. The increased use of the existing transit system would reduce dependency on the automobile and reduce the generation of respective air pollutant and GHG emissions, energy demand, and mobile source noise effects on the environment that result from automobile use.</p>
Maximize the productivity of our transportation system.	<p><b>No Conflict.</b> The Project would locate a high-density residential, hotel, and commercial/restaurant uses on a Project Site within an identified HQTAs and in an area served by a range of existing local and regional bus lines, and the Metro Red Line. The proximity of the Project's residential, hotel, and commercial uses to the transit and freeway systems would maximize the productivity of the transportation system and, as such, would be consistent with this policy.</p>
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	<p><b>No Conflict.</b> The Project would implement Project Design Features to reduce air quality impacts, including compliance with the Los Angeles Green Building Code and 2016 CalGreen Code, and voluntary compliance with USGBC LEED or equivalent standards (see Sections IV.B, <i>Air Quality</i>, and IV.F, <i>Greenhouse Gas Emissions</i>, of this Draft EIR). As set forth in the HRA, Project residents would not be exposed to significant levels of TACs from the Hollywood Freeway.</p> <p>The Project's residential, hotel, and commercial/restaurant development would be located in a mixed use area that would provide opportunities for pedestrian and bicycle transit. The Project would include 258 bicycle parking spaces, new pedestrian lighting, improved sidewalks and street trees to enhance the bicycling and pedestrian experience, and encourage both modes of transportation.</p>

Policy	Would the Project Conflict?
Actively encourage and create incentives for energy efficiency, where possible.	<p><b>No Conflict.</b> As noted above, the Project would support a land use pattern that provides increased opportunity for use of alternative transportation which would contribute to reductions in trips and vehicle miles traveled with resulting benefits to energy efficiency.</p> <p>The Project would be designed and operated to comply with applicable requirements of the Los Angeles Green Building Code and the 2016 CalGreen Code, and voluntary compliance with USGBC LEED or equivalent standards. Some of the Project's key design features that contribute to energy efficiency include the use of energy efficient glass/window areas for ventilation and daylight accessibility, landscaping of roof decks, high efficiency fixtures and appliances, and water conservation features.</p>
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	<p><b>No Conflict.</b> As described above, the Project would intensify development on a Project Site located within an identified HQTa and in an urban area served by the Metro Red Line, and numerous regional Metro bus lines, and local LADOT DASH lines. Furthermore, the Project would provide high density residential, hotel, and commercial/restaurant uses in an area with pedestrian access to a large range of commercial and entertainment services as well as numerous job opportunities. Also, the Project would provide up to 258 bicycle parking spaces, new pedestrian lighting, improved sidewalks and street trees to enhance the bicycling and pedestrian experience, and encourage both modes of transportation.</p>
SOURCE: ESA, 2019.	

## Conclusion

Based on the analysis of the Project's consistency with applicable policies of the General Plan Framework, the Health and Wellness Element of the City's General Plan, the Housing Element of the City's General Plan, the Hollywood Community Plan, the Hollywood Redevelopment Plan, 2010 Bicycle Plan and Mobility Plan 2035, SCAG's 2016 RTP/SCS, the City's Advisory Notice for Freeway-Adjacent Projects (ZI No. 2427) and related SCAQMD and CARB guidelines, and the regulation of the LAMC, the Project would be substantially consistent with the relevant land use policies adopted for the purpose of avoiding or mitigating a significant environmental effect.

The Project would be consistent with policies related to siting of residential uses near substantial sources of air pollutants (the Hollywood Freeway) as stated in the Framework Element, Health and Wellness Element, Housing Element, 1988 Hollywood Community Plan, and the 2016 RTP/SCS. Although residential uses are located near the Hollywood Freeway, on-site residents would not be exposed to significant levels of TACs based on applicable SCAQMD thresholds.

Approval of the Project's requested approvals, including but not limited to, zone change and height district change, conditional use permits, Site Plan Review and related findings and conditions to ensure compatibility with surrounding land uses would ensure that the Project is consistent with the Framework Element, Housing Element, Hollywood Community Plan, Hollywood Redevelopment Plan, and LAMC regarding density, FAR, building height, and preservation of housing. Therefore, with the approval of the proposed entitlements, the Project would be consistent with applicable plans and regulations. Therefore, land use impacts related to consistency with plans and regulations adopted to avoid or mitigate environmental effects would be less than significant.

**In summary, for all of the reasons discussed above, the Project would not 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.**

### **e) Cumulative Impacts**

Chapter III, *General Description of Environmental Setting*, lists 137 related projects identified by the City that are planned or are under construction in the Project study area. The related projects reflect infill development within the larger, built-out Hollywood area. Many of the related projects are proposed for properties designated for Regional Center Commercial land uses that are located in the Hollywood Center, as identified in the Hollywood Community Plan, and Regional Center, as identified in the Framework Element. Many of the related projects are also located within the Hollywood Redevelopment Plan area. Designations under the Framework Element and Hollywood Community Plan are intended to accommodate a large range of mixed uses, such as residential development, office space, retail, hotel, restaurant services, and entertainment activity. Much of the development includes restaurant uses that would add to its vibrancy of the downtown area. There are also residential, office, hotel, and commercial developments proposed. Other related projects are mixed-use projects. Related Project 79, Hollywood Central Park, is a proposed 44-acre street-level community park with a range of green space and park facilities built upon a cap over the Hollywood Freeway. If implemented, the Hollywood Central Park would provide community amenity and offset impacts of increased development density.

The variety of uses and densities reflected in the related projects would be consistent with the general intent of these plans and support the development of the Hollywood community as anticipated, therein. Related projects are subject to CEQA review, and review by City regulatory agencies. Most notably, related projects seeking increases in permitted densities, and buildings seeking increases densities are subject to review by the City Planning Commission or the City Council on appeal and review for consistency with plan provisions.

The related projects are dispersed throughout the larger Hollywood area, which has established land use patterns and districts. The related projects are in-fill in nature and,



while increasing density, would not alter the basic land use patterns. As noted above, the related projects would contribute to the diversity of uses anticipated in applicable plans and goals for revitalization of the Hollywood community.

Of the 137 related projects, six are located adjacent to or in close proximity to the Project Site:

- Related Project No. 16: Kimpton Everly Hotel Project at 1800 Argyle Avenue – 225 room hotel, 16 stories.
- Related Project No. 5: Argyle House Condos at 6230 Yucca Street – 85 condominium units and 13,890 square feet commercial, 16 stories.
- Related Project No. 29: (Hollywood Center): Mixed-use project located at 1740 Vine Street, including two 11-story senior housing 35-story, a 46-story, and buildings, and public paseo.
- Related Project No. 14: Pantages Theater Office at 6225 Hollywood Boulevard – 214,000 square feet office, 10 stories.
- Related Project No. 2: El Centro Mixed Use at 6200 Hollywood Boulevard – 952 apartment units and 190,000 square feet retail (Phase 1 complete), 60 to 85 feet.
- Related Project No. 12: Hanover Gower Mixed-Use – 6100 Hollywood Boulevard, 151 apartment units and 6,200 square feet retail.

Related Project Nos. 5, 29, 2, and 12, represent mixed use development, which, combined with the Project, would support pedestrian activity, add to the vibrancy of Yucca Street, Argyle Avenue, and Hollywood Boulevard, and provide a range of housing and retail choices. Related Project No. 16 would provide another hotel option in the Hollywood area which would help promote tourism, and hotel guests would support nearby retail and restaurant uses, including those proposed by the Project. Related Project No. 14 would increase office space and generate workers who would patronize nearby establishments, including the retail and restaurant uses proposed by the Project. These projects reflect the variety of uses and densities identified for a Regional Center Commercial land use in the Community Plan.

The Project, in combination with the related projects, represents a continuing trend of infill development at increased densities. However, future development, including the Project, would serve to modernize the area, activate the pedestrian environment, concentrate development near public transportation, and promote synergy among uses.

As discussed above, the Project would be substantially consistent with the regulatory framework and its implementation would not have an adverse effect on the implementation of plans and regulations in the Project Site vicinity. Therefore, the Project would not contribute to cumulatively considerable impacts regarding variations from plans and regulatory provisions.

### **f) Mitigation Measures**

Project impacts regarding land use would be less than significant. Therefore, no mitigation measures are required.

### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to land use would be less than significant and no mitigation measures are required.

# **IV. Environmental Impact Analysis**

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## **I. Noise**

### **1. Introduction**

This section analyzes potential noise and groundborne vibration impacts that could result from the Project. The analysis describes the existing noise environment within the Project Site area, estimates future noise and groundborne vibration levels at surrounding land uses associated with construction and operation of the Project, assesses the potential for significant impacts resulting from these future levels, 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. Noise worksheets and technical information and data used in this analysis are included in the *Noise and Groundborne Vibration Technical Appendix*, prepared by ESA, which is included in Appendix I of this Draft EIR.

### **2. Environmental Setting**

#### **a) Noise and Groundborne Vibration Overview**

Because of the technical nature of noise and groundborne vibration impacts, a brief overview of basic noise principals and descriptors is provided below.

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).<sup>1</sup> Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Sound is a process that consists of three components: a noise of sound (or noise), a receiver, and the propagation path between the two.<sup>2</sup> 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.<sup>3</sup>

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.<sup>4</sup> The dB scale is a logarithmic scale that describes the physical

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<sup>1</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.1, September 2013. Provided in Appendix I of this Draft EIR.

<sup>2</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.1, September 2013. Provided in Appendix I of this Draft EIR.

<sup>3</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.1, September 2013. Provided in Appendix I of this Draft EIR.

<sup>4</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.3.2, September 2013. Provided in Appendix I of this Draft EIR.

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.<sup>5</sup> Pressure waves traveling through air exert a force registered by the human ear as sound.<sup>6</sup>

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound.<sup>7</sup> 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.<sup>8</sup> The typical human ear is not equally sensitive to this frequency range and 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.<sup>9</sup> 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.<sup>10</sup> 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**.

### (1) 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.<sup>11</sup> The background noise level changes throughout a typical day but does so gradually, corresponding to the addition and subtraction of distant noise sources, such as changes in traffic volume.<sup>12</sup> 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.<sup>13</sup>

<sup>5</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.3.6, September 2013. Provided in Appendix I of this Draft EIR.

<sup>6</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.1, September 2013. Provided in Appendix I of this Draft EIR.

<sup>7</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.3.1, September 2013. Provided in Appendix I of this Draft EIR.

<sup>8</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.3.7, September 2013. Provided in Appendix I of this Draft EIR.

<sup>9</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.3.6, September 2013. Provided in Appendix I of this Draft EIR.

<sup>10</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.1.3.6, September 2013. Provided in Appendix I of this Draft EIR.

<sup>11</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.2.2, September 2013. Provided in Appendix I of this Draft EIR.

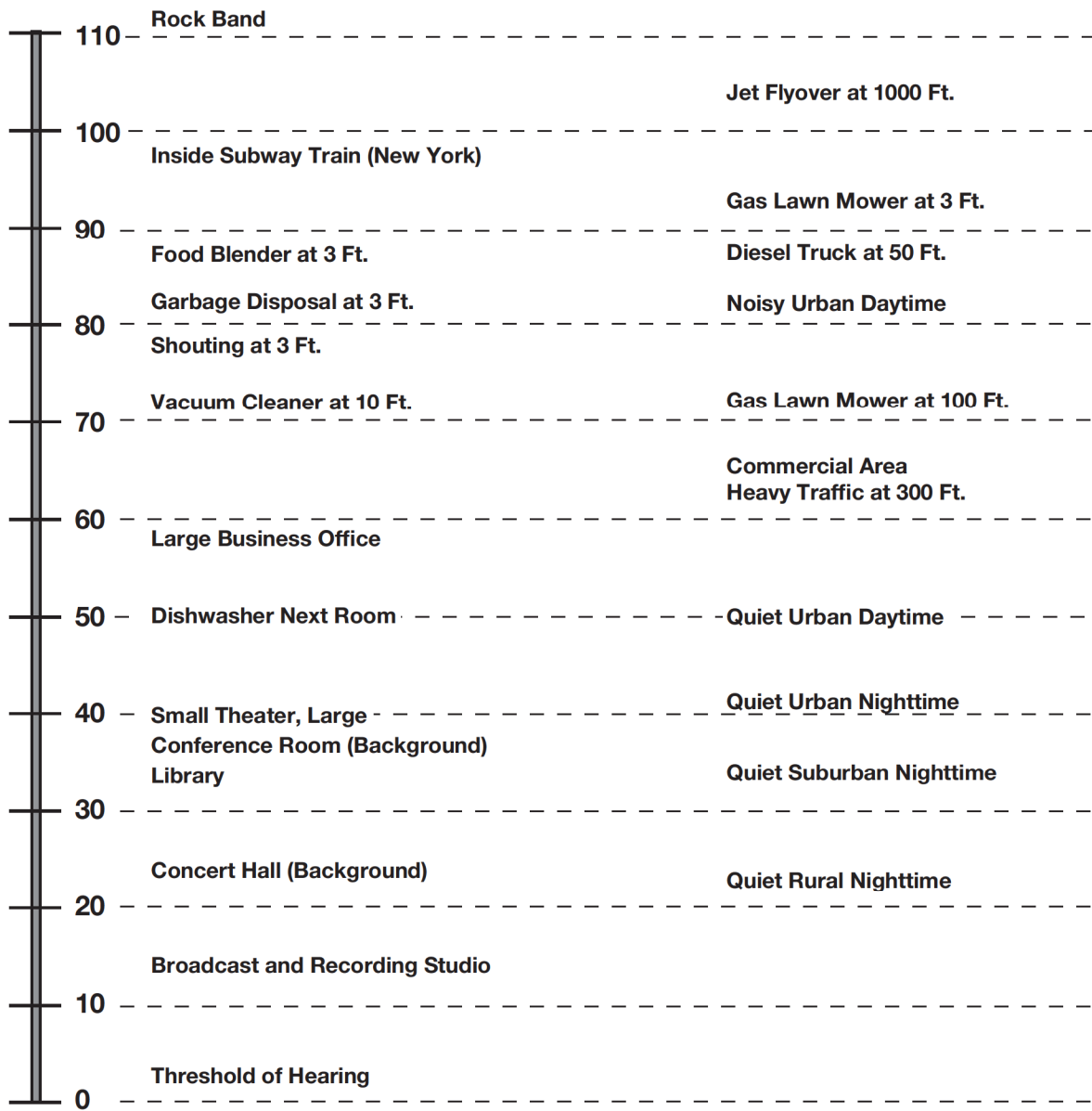
<sup>12</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.2.2, September 2013. Provided in Appendix I of this Draft EIR.

<sup>13</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.2.2, September 2013. Provided in Appendix I of this Draft EIR.

**NOISE  
LEVEL  
(dBA, Leq)**

**COMMON INDOOR  
NOISE LEVELS**

**COMMON OUTDOOR  
NOISE LEVELS**



SOURCE: State of California, Department of Transportation (Caltrans), Technical Noise Supplement (TeNS). October 1998. Available: [http://www.dot.ca.gov/hq/env/noise/pub/Technical Noise Supplement.pdf](http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf)

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**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 characterize an existing community noise environment.<sup>14</sup> The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project.<sup>15</sup>

**L<sub>eq</sub>:** The equivalent sound level over a specified period of time, typically, one hour (L<sub>eq</sub>). The L<sub>eq</sub> may also be referred to as the average sound level.

**L<sub>max</sub>:** The maximum, instantaneous noise level experienced during a given period of time.

**L<sub>min</sub>:** The minimum, instantaneous noise level experienced during a given period of time.

**L<sub>x</sub>:** The noise level exceeded a percentage of a specified time period. For instance, L<sub>50</sub> and L<sub>90</sub> represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

**L<sub>dn</sub>:** 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<sub>dn</sub> 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.

## (2) 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:<sup>16</sup>

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Stress effects (e.g., startle response, contributor to stress-related diseases such as hypertension, anxiety, and heart disease)
- Physical effects (e.g., hearing loss)

<sup>14</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.2.2.2, September 2013. Provided in Appendix I of this Draft EIR.

<sup>15</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.2.2.2, September 2013. Provided in Appendix I of this Draft EIR.

<sup>16</sup> California Department of Transportation, Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol, Section 2.2.4, September 2013. Provided in Appendix I of this Draft EIR.

Although exposure to high noise levels has been demonstrated to cause physical and stress-related effects, environmental noise exposure can interrupt ongoing activities causing community annoyance.<sup>17</sup> Subjective and interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and sleep.<sup>18</sup> Sleep interference effects can include both awakening and arousal to a lesser state of sleep.<sup>19</sup>

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.<sup>20</sup> For human reactions to sound, people find high noise levels more objectionable than low-level noise; have better sensitivity to high frequency noise than low frequency noise; tend to compare a new intruding noise source to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment); and may find noise objectionable in a certain environment but not in others (e.g., traffic noise may not be objectionable to people in an office but might be objectionable while sleeping at home or studying in a library).<sup>21</sup> 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:<sup>22</sup>

- 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 a 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.<sup>23</sup> Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion but, rather, logarithmically. Under the

<sup>17</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 3.4, 2018.

<sup>18</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 3.4, 2018.

<sup>19</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1, September 2013.

<sup>20</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1, September 2013.

<sup>21</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1, September 2013.

<sup>22</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1.1, September 2013.

<sup>23</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1.1, September 2013.

dBA scale, a doubling of sound energy corresponds to a 3-dBA increase.<sup>24</sup> 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.<sup>25</sup> 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.<sup>26</sup>

### (3) Noise Attenuation

When noise propagates over a distance, the noise level reduces with distance at a rate that depends 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 at 100 feet, 68 dBA at 200 feet, etc.).<sup>27</sup> 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.<sup>28</sup> 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.<sup>29</sup> 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).<sup>30</sup>

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.<sup>31</sup> Noise from a line source propagates over a cylindrical surface, often referred to as “cylindrical spreading.”<sup>32</sup> 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.<sup>33</sup> Therefore, noise due to a line source is attenuated less with distance than that of a point source with increased distance.

<sup>24</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1.1, September 2013.

<sup>25</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1.1, September 2013.

<sup>26</sup> California Department of Transportation, Technical Noise Supplement, Section 2.2.1.1, September 2013.

<sup>27</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.1, September 2013.

<sup>28</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.1, September 2013.

<sup>29</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.1, September 2013.

<sup>30</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.2, September 2013.

<sup>31</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.1, September 2013.

<sup>32</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.1, September 2013.

<sup>33</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.1 and 2.1.4.2, September 2013.



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.<sup>34</sup> 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.<sup>35</sup>

#### (4) Groundborne Vibration and Noise Fundamentals

Groundborne 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, groundborne vibration becomes less perceptible with increasing distance from the source.

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.

Several different methods are used to quantify groundborne vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the groundborne vibration signal in inches per second (in/sec), and is most frequently used to describe groundborne vibration impacts to buildings.<sup>36</sup> 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 groundborne vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS.<sup>37</sup> 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. The PPV crest factor is typically a factor of 1.7 to 6 times greater than RMS vibration velocity.<sup>38</sup> The vibration decibel metric, VdB, acts to compress the range of numbers required to describe groundborne vibration in a logarithmic scale. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for groundborne vibration include buildings where vibration would interfere with operations within the building or cause structural damage (especially older masonry structures), locations where people sleep, and locations with vibration sensitive equipment.<sup>39</sup>

<sup>34</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.3, September 2013.

<sup>35</sup> California Department of Transportation, Technical Noise Supplement, Section 2.1.4.3, September 2013.

<sup>36</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.

<sup>37</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.

<sup>38</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.

<sup>39</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 6.1, 6.2, and 6.3, 2018.

The effects of groundborne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hangings on walls, and rumbling sounds. In extreme cases, the groundborne vibration can cause damage to buildings.<sup>40</sup> 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.<sup>41</sup> A groundborne vibration level that causes annoyance will be well below the damage threshold for normal buildings.<sup>42</sup>

Groundborne noise is a result of groundborne vibration and specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.<sup>43</sup> The relationship between groundborne vibration and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise level that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is 30 to 60 Hz), the groundborne noise level will be approximately 35 to 37 decibels lower than the velocity level.<sup>44</sup> Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level.

## **b) Regulatory Framework**

Various government agencies have established noise regulations and policies to protect people from adverse effects associated with noise and groundborne noise and vibration. The City has adopted a number of regulations and policies, which are based in part on federal and State regulations and are intended to control, minimize, or avoid environmental noise effects. There are no City-adopted regulations or policies that relate to groundborne vibration; therefore, the City has determined to use the groundborne noise and vibration standards and guidelines from the Federal Transit Administration (FTA) are used for this analysis. The regulations and policies that are relevant to the Project's potential construction and operation impacts are discussed below.

### **(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.

<sup>40</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 5.5, 2018.

<sup>41</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 5.5, 2018.

<sup>42</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 5.5, 2018.

<sup>43</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.4, 2018.

<sup>44</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3 and Table 6-14, pages 126 and 146, 2018.

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 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 Groundborne Vibration and Noise Standards*

There are no federal vibration standards or regulations adopted by an agency that are applicable to evaluating potential groundborne vibration and groundborne noise impacts from land use development projects such as the Project. However, the Federal Transit Administration (FTA) has adopted criteria for use in evaluating groundborne vibration impacts from construction activities.<sup>45</sup> The groundborne vibration damage criteria adopted by the FTA are shown in **Table IV.I-1, Construction Groundborne Vibration Damage Criteria**.

**TABLE IV.I-1**  
**CONSTRUCTION GROUNDBORNE VIBRATION DAMAGE CRITERIA**

Building Category	PPV (in/sec)	Approximate Vibration Level (VdB) <sup>a</sup>
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

<sup>a</sup> RMS velocity in decibels, VdB re 1 micro-in/sec

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

The FTA has also adopted criteria for assessing potential human annoyance impacts caused by groundborne vibration for the following three land-use category receptors: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.<sup>46</sup> The 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.<sup>47</sup> Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and optical microscopes.<sup>48</sup> Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels

<sup>45</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, page 186, 2018.

<sup>46</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

<sup>47</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

<sup>48</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

and hospitals.<sup>49</sup> Category 3 refers to institutions and offices that have vibration-sensitive equipment and have the potential for activity interference such as schools, churches, doctors' offices. Commercial or industrial locations including office buildings are not included in this category unless there is vibration-sensitive activity or equipment within the building.<sup>50</sup> The groundborne vibration thresholds associated with human annoyance for these three land-use categories are shown in **Table IV.I-2, *Groundborne Vibration Impact Criteria for General Assessment***. As discussed previously, groundborne noise is a result of groundborne vibration. The FTA criteria for groundborne noise is based on the equivalent groundborne vibration level; therefore, an assessment of the FTA groundborne vibration criteria is also an equivalent assessment of the FTA groundborne noise criteria.

**TABLE IV.I-2**  
**GROUNDBORNE VIBRATION IMPACT CRITERIA FOR GENERAL ASSESSMENT**

Land Use Category	Frequent Events <sup>a</sup>	Occasional Events <sup>b</sup>	Infrequent Events <sup>c</sup>
<b>Category 1:</b> Buildings where vibration would interfere with interior operations.	65 VdB <sup>d</sup>	65 VdB <sup>d</sup>	65 VdB <sup>d</sup>
<b>Category 2:</b> Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
<b>Category 3:</b> Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

<sup>a</sup> "Frequent Events" is defined as more than 70 vibration events of the same source per day.

<sup>b</sup> "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

<sup>c</sup> "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.

<sup>d</sup> 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 Manual, 2018.

## (2) State of California

### (a) California Noise Standards

The State of California has 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, Part 2). The noise insulation standards set an interior standard of 45 dBA CNEL in any habitable room. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

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

<sup>49</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

<sup>50</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

development, with 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.

(b) *California Groundborne Vibration and Noise Standards*

The State of California has not adopted statewide standards or regulations for evaluating groundborne vibration or groundborne noise impacts from land use development projects such as the Project.

(3) **City of Los Angeles**

(a) *Los Angeles Municipal Code*

The City of Los Angeles Noise Regulations are provided in Chapter XI of the Los Angeles Municipal Code (LAMC). Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of “offending” noise sources. In accordance with the LAMC, a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line is considered to create a noise violation. To account for people’s greater tolerance for short-duration noise events, the Noise Regulations provide a 5 dBA allowance for a noise source that causes noise lasting more than five minutes but less than 15 minutes in any one-hour period, and an additional 5 dBA allowance (total of 10 dBA) for a noise source that causes noise lasting five minutes or less in any one-hour period.<sup>51</sup>

The LAMC provides that in cases where the actual ambient conditions are not known, the City’s presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels as defined in Section 111.03 of the LAMC should be used. The presumed ambient noise levels for such areas as set forth in the LAMC Sections 111.03 are provided in **Table IV.I-3, City of Los Angeles Presumed Ambient Noise Levels**. For example, for residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime.

**TABLE IV.I-3  
CITY OF LOS ANGELES PRESUMED AMBIENT NOISE LEVELS**

<b>Zone</b>	<b>Daytime Hours (7 A.M. to 10 P.M.) dBA (L<sub>eq</sub>)</b>	<b>Nighttime Hours (10 P.M. to 7 A.M.) dBA (L<sub>eq</sub>)</b>
Residential	50	40
Commercial	60	55
Manufacturing (M1, MR1 and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

SOURCE: LAMC, Section 111.03.

<sup>51</sup> Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

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 five (5) decibels.

Section 112.05 of the LAMC 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.”<sup>52</sup> Section 41.40 of the LAMC 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 equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

Section 113.01 of the LAMC 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 Section 66.00 of LAMC, 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.

#### *(b) Noise Element*

The Noise Element of the City’s General Plan establishes CNEL guidelines for land use compatibility, which is also provided in the City’s L.A. CEQA Thresholds Guide (Thresholds Guide). The overall purpose of the Noise Element of the General Plan is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of people to excessive noise levels. The following policies and objectives from the Noise Element of the General Plan are applicable to the Project:<sup>53</sup>

**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 2.1:** 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.

<sup>52</sup> 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.

<sup>53</sup> City of Los Angeles. Noise Element of the Los Angeles City General Plan, adopted February 3, 1999. Available at: [https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise\\_Element.pdf](https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf). Accessed September 2019.

**Objective 3 (Land Use Development):** Reduce or eliminate noise impacts 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.

The City's noise compatibility guidelines are provided in **Table IV.I-4, City of Los Angeles Land Use Compatibility for Community Noise**.

**TABLE IV.I-4**  
**CITY OF LOS ANGELES LAND USE COMPATIBILITY FOR COMMUNITY NOISE**

Land Use	Community Noise Exposure CNEL (dBA)			
	Normally Acceptable <sup>a</sup>	Conditionally Acceptable <sup>b</sup>	Normally Unacceptable <sup>c</sup>	Clearly Unacceptable <sup>d</sup>
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	—

<sup>a</sup> 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.

<sup>b</sup> 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.

<sup>c</sup> 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.

<sup>d</sup> Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of Los Angeles, L.A. CEQA Thresholds Guide (Thresholds Guide), 2006.

### (a) *Guidelines for Noise Compatible Land Use*

The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the Governor's Office of Planning and Research for use in assessing the compatibility of various land use types within a range of noise levels. These guidelines are set forth in the Thresholds Guide in terms of CNEL levels. As explained above, these 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-4, the categories overlap to some degree. For example, a CNEL value of 60 dBA is the lower limit of what is considered a "conditionally acceptable" noise environment for multi-family residential uses, although the upper limit of what is considered "normally acceptable" for multi-family residential uses is set at 65 dBA CNEL.<sup>54</sup> 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.

### (b) *Groundborne Vibration and Noise*

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. As such, available guidelines from the FTA are utilized to assess impacts due to groundborne vibration and noise. As discussed above, in most circumstances common groundborne vibrations related to roadway traffic and construction activities pose no threat to buildings or structures.

## c) **Existing Conditions**

As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project Site is located in a highly urbanized area. The predominant source of noise in the vicinity of the Project Site is vehicular traffic on adjacent roadways, particularly along Argyle Avenue and Yucca Street. Ambient noise sources in the vicinity of the Project Site include traffic, transit, and trucks; commercial activities; surface parking lot activities; construction noise from developing properties in the area; and other miscellaneous noise sources associated with typical urban activities.

### (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 locations and the effect that noise can have on those activities and the persons engaged in them. The City's Thresholds Guide states that residences, schools (pre-school, elementary, middle, and high schools), motels and hotels, libraries, religious institutions, hospitals, nursing homes, auditoriums, concert

<sup>54</sup> City of L.A. CEQA Thresholds Guide, Section I.2, 2006.



halls, amphitheaters, playgrounds, and parks are generally more sensitive to noise than commercial and industrial land uses.<sup>55</sup>

Existing noise sensitive uses within 500 feet of the Project Site include the following as shown in **Figure IV.I-2, Noise Measurement Locations and Existing Noise Sensitive Locations**:

- Residential Uses: Existing one- and two-story single-family residences and duplexes are located adjacent and to the east and south of the Project Site along Vista Del Mar Avenue.
- Residential Uses: Existing five-story mixed-use residential and commercial uses are located to the south of the Project Site, south of the vacant parcel and south of Carlos Avenue.
- Residential and Hotel Uses: Existing three-story residential lofts and hotel uses are located to the north of the Project Site, north of Yucca Street.
- Residential Uses: Existing multi-family residential uses are located to the west of the Project Site, west of Argyle Avenue.

All other noise-sensitive uses of the type listed in the Thresholds Guide are located at greater distances from the Project Site (more than 500 feet) and would experience lower noise levels from potential sources of noise on the Project Site. Therefore, noise levels at additional sensitive receptors beyond those identified above were not evaluated.

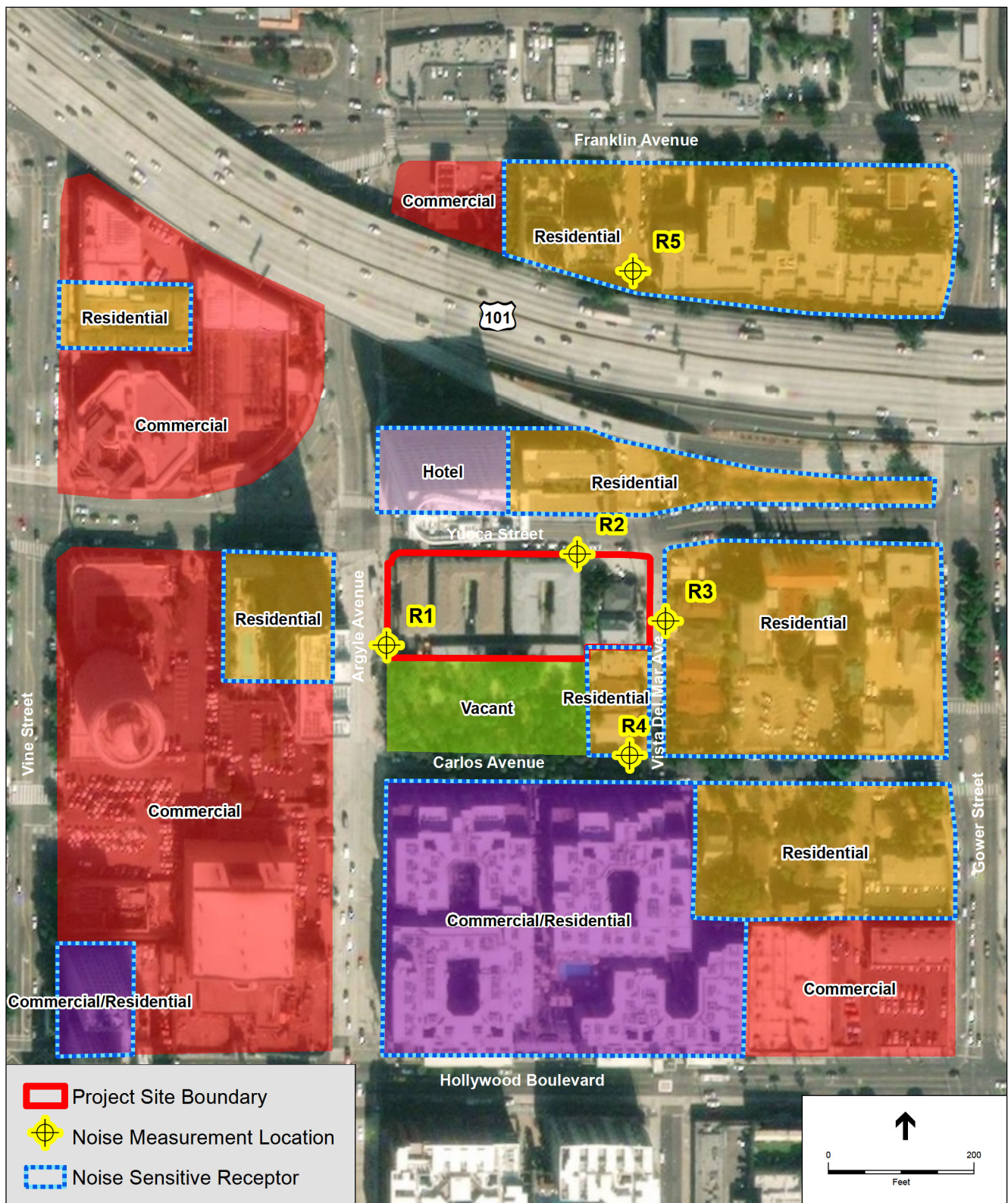
### (1) Ambient Noise Levels

The predominant existing noise source surrounding the Project Site is traffic noise from the US 101 Freeway and from Yucca Street to the north, Argyle Avenue to the west, and to a lesser extent, Vista Del Mar Avenue to the east. Secondary noise sources include general commercial-related activities, such as loading dock/delivery truck activities, trash compaction, and refuse service activities, from Capital Records, the Pantages Theater, nearby restaurants and bars, and an auto repair shop.

### (2) Ambient Noise Levels

The predominant existing noise source surrounding the Project Site is traffic noise from the US 101 Freeway and from Yucca Street to the north, Argyle Avenue to the west, and to a lesser extent, Vista Del Mar Avenue to the east. Secondary noise sources include general commercial-related activities, such as loading dock/delivery truck activities, trash compaction, and refuse service activities, from Capital Records, the Pantages Theater, nearby restaurants and bars, and an auto repair shop.

<sup>55</sup> City of Los Angeles, LA CEQA Thresholds Guide, 2006. pages I.1-3.



SOURCE: NAIP, 2016 (Aerial).

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**Figure IV.I-2**  
Noise Measurement Locations and  
Existing Noise Sensitive Receptor Location

Ambient noise measurements were taken at five locations, representing the nearby land uses in the vicinity of the Project Site to establish conservative ambient noise levels. The measurement locations, along with existing development, are shown on Figure IV.I-2. Long-term (24-hour) measurements were taken at locations R1 and R2 from Thursday, June 11, through Sunday, June 14, 2015 and short-term (15-minute) noise measurements were taken at locations R3 through R5 on Thursday, June 11, 2015. These measurements were taken from Thursday, June 11, through Sunday, June 14, 2015, to characterize the existing noise environment in the Project vicinity.<sup>56</sup>

The ambient noise measurements were conducted using the Larson-Davis 820 Precision Integrated Sound Level Meter ("SLM"). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of five feet above the local grade, at the following locations as shown in Figure IV.I-2:

- Measurement Location R1: This measurement location represents the existing noise environment at the Project Site along Argyle Avenue, and is considered representative of the noise environment of the existing off-site multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue, approximately 80 feet from the Project Site boundary. The sound level meter was placed on the western boundary of the Project Site.
- Measurement Location R2: This measurement location represents the existing noise environment at the Project Site along Yucca Street, and is considered representative of the noise environment of the existing off-site residential uses and hotel uses on the north side of Yucca Street, approximately 65 feet from the Project Site boundary. The sound level meter was placed on the northern boundary of the Project Site.
- Measurement Location R3: This measurement location represents the existing noise environment at the residential uses east and southeast of the Project Site along Vista Del Mar Avenue, approximately 5 feet from the Project Site boundary. The sound level meter was placed on the eastern boundary of the Project Site.
- Measurement Location R4: This measurement location represents the existing noise environment of the single and multi-family residential uses south of the Project Site along Carlos Avenue, including the multi-family residential uses south of Carlos Avenue, approximately 190 feet from the Project Site boundary. The sound level meter was placed at the northwestern corner of Carlos Avenue and Vista Del Mar Avenue.<sup>57</sup>

<sup>56</sup> Schools serving the Project Site include Cheremoya Avenue Elementary School, Hollywood High School, and Joseph Le Conte Middle School, which are single-track schools within the Los Angeles Unified School District (refer to Section IV.K.3, Public Services – Schools, of this Draft EIR). For the 2014-15 school year, the last day of instruction was June 4, 2015 (refer to LAUSD website at: <https://achieve.lausd.net/Page/6653>); therefore, school would not have been in session during noise measurements. As a result, the measured noise levels represent a conservative estimate of the typical noise environment. It is expected that if school were in session, ambient noise levels from increased traffic would be higher and thus the threshold would be higher and less conservative than presented herein.

<sup>57</sup> The analysis for R4 is utilized to assess impacts to the Eastown Apartments south of the Project Site. Noise levels along Carlos (R4: 56 dBA) are lower than noise levels along Argyle Ave (R1: 65 dBA), so the analysis at R4 along Carlos would provide a conservative assessment of impacts at the Eastown Apartments along Argyle.

- **Measurement Location R5:** This measurement location represents the existing noise environment of the multi-family residential uses north of the Project Site, approximately 380 feet from the Project Site boundary, and north of, and adjacent to, the US 101 Freeway. The sound level meter was placed at the multi-family residential uses that are located approximately 160 feet south of the southeastern corner of Vista Del Mar Avenue and Franklin Avenue.

A summary of the noise measurement data is provided in **Table IV.I-5, Summary of Ambient Noise Measurements**. Daytime noise levels ranged from 56 dBA to 67 dBA  $L_{eq}$  and nighttime noise levels ranged from 55 dBA to 63 dBA  $L_{eq}$ .

### (3) Existing Roadway Noise Levels

Existing roadway CNEL noise levels were calculated for the 26 roadway segments located in the vicinity of the Project Site that were identified for analysis by the City. The roadway segments selected for analysis are considered to be those that are expected to be the most directly impacted by Project-related traffic, which, for the purpose of this analysis, include the roadways that are located near and immediately adjacent to the Project Site. 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 (as distances are increased from the Project Site, traffic is spread out over a greater geographic area and its effects are reduced).

Existing roadway CNEL noise levels were calculated using the Federal Highway Administration's (FHWA's) Traffic Noise Model (TNM) methodology<sup>58</sup> and traffic volumes at the study intersections analyzed in the Project's Traffic Study prepared by Gibson Transportation Consulting, Inc. and provided in Appendix L-2 of this Draft EIR.<sup>59</sup> The 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 Predicted Existing Vehicular Traffic Noise Levels**.

As shown in Table IV.I-6, the ambient noise environment of the Project Site vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. The calculated CNEL (at a distance of approximately 25 feet from the roadway right-of-way) from actual existing traffic volumes on the analyzed roadway segments ranged from 60.9 dBA to 71.6 dBA for residential areas and commercial areas.

<sup>58</sup> The noise prediction model which was developed based on calculation methodologies described in FHWA Traffic Noise Model Technical Manual (1998) and validated with the results from FHWA Traffic Noise Model Version 2.5. Available at: [file:///C:/Users/spalomera/Downloads/dot\\_10000\\_DS1%20\(1\).pdf](file:///C:/Users/spalomera/Downloads/dot_10000_DS1%20(1).pdf). Accessed September 2019.

<sup>59</sup> Gibson Transportation Consulting, Inc. Traffic Study for the 6220 Yucca Street Mixed-Use Project, 2018. Provided in Appendix L-2 of this Draft EIR.

**TABLE IV.I-5  
SUMMARY OF AMBIENT NOISE MEASUREMENTS**

Location, Duration, Existing Land Uses and, Date of Measurements	Measured Ambient Noise Levels (dBA) <sup>a</sup>			
	Daytime (7 A.M. to 10 P.M.) Hourly L <sub>eq</sub>	Daytime Average Hourly L <sub>eq</sub>	Nighttime (10 P.M. to 7 A.M.) Hourly L <sub>eq</sub>	Nighttime Average Hourly L <sub>eq</sub>
<b>R1 –</b>				
6/11/15 (11:00 A.M. to 11:59 P.M.)/Thursday	64 – 66	65	62 – 63	61
6/12/15 (24 hour)/Friday	63 – 67		59 – 63	
6/13/15 (24 hour)/Saturday	62 – 66		56 – 63	
6/14/15 (24 hour)/Sunday	61 – 66		58 – 62	
<b>R2</b>				
6/11/15 (11:00 A.M. to 11:59 P.M.)/Thursday	59 – 63	61	60	59
6/12/15 (24 hour)/Friday	59 – 63		55 – 62	
6/13/15 (24 hour)/Saturday	59 – 62		57 – 61	
6/14/15 (24 hour)/Sunday	59 – 61		56 – 60	
<b>R3</b>				
6/11/15 (11:00 A.M. to 12:00 P.M.)/Thursday	58	N/A	N/A	N/A
<b>R4</b>				
6/11/15 (11:00 A.M. to 12:00 P.M.)/Thursday	56	N/A	N/A	N/A
<b>R5</b>				
6/11/15 (12:00 P.M. to 1:00 P.M.)/Thursday	71	N/A	N/A	N/A

<sup>a</sup> Detailed measured noise data, including hourly Leq levels, are included in Appendix I.

SOURCE: ESA, 2019.

**TABLE IV.I-6  
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS**

<b>Roadway Segment</b>	<b>Adjacent Land Use</b>	<b>Existing Noise Exposure Compatibility Category <sup>b,c</sup></b>	<b>Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way <sup>a</sup> 25 Feet</b>
<b>Franklin Avenue</b>			
Between Cahuenga Boulevard and Vine Street	Residential/ Commercial	Conditionally Acceptable	68.3
Between Argyle Avenue and Gower Street	Residential/ Commercial	Conditionally Acceptable	69.9
Between Gower Street and Beachwood Drive	Residential/ Commercial	Normally Unacceptable	70.2
Between Beachwood Drive and Bronson Avenue	Residential/ Commercial	Normally Unacceptable	70.0
<b>Yucca Street</b>			
Between Cahuenga Boulevard and Ivar Avenue	Commercial	Normally Acceptable	64.5
Between Ivar Avenue and Vine Street	Commercial	Conditionally Acceptable	65.2
Between Vine Street and Argyle Avenue	Commercial	Normally Acceptable	63.8
Between Argyle Avenue and Gower Street	Residential/ Commercial	Conditionally Acceptable	60.9
<b>Hollywood Boulevard</b>			
Between Cahuenga Boulevard and Ivar Avenue	Commercial	Normally Acceptable	68.7
Between Ivar Avenue and Vine Street	Commercial	Normally Acceptable	68.8
Between Vine Street and Argyle Avenue	Residential/ Commercial	Conditionally Acceptable	69.2
Between Argyle Avenue and Gower Street	Residential/ Commercial	Conditionally Acceptable	69.6
Between Gower Street and Bronson Avenue	Commercial	Normally Acceptable	68.8

**TABLE IV.I-6  
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS**

<b>Roadway Segment</b>	<b>Adjacent Land Use</b>	<b>Existing Noise Exposure Compatibility Category <sup>b,c</sup></b>	<b>Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way <sup>a</sup> 25 Feet</b>
<b>Argyle Avenue</b>			
Between Franklin Avenue and Yucca Street	Commercial	Normally Acceptable	66.6
Between Yucca Street and Hollywood Boulevard	Residential/Commercial	Conditionally Acceptable	65.7
Between Hollywood Boulevard and Selma Avenue	Residential/Commercial	Conditionally Acceptable	65.8
Between Selma Avenue and Sunset Boulevard	Residential/Commercial	Normally Acceptable	63.7
<b>Vine Street</b>			
Between Franklin Avenue and Yucca Street	Residential/Commercial	Conditionally Acceptable	68.8
Between Yucca Street and Hollywood Boulevard	Commercial	Normally Acceptable	69.5
Between Hollywood Boulevard and Selma Avenue	Residential/Commercial	Conditionally Acceptable	69.8
Between Selma Avenue and Sunset Boulevard	Residential/Commercial	Normally Unacceptable	70.1
<b>Gower Street</b>			
Between Franklin Avenue and Yucca Street	Residential/Commercial	Conditionally Acceptable	68.4
Between Yucca Street and Hollywood Boulevard	Residential/Commercial	Conditionally Acceptable	67.8
Between Hollywood Boulevard and Sunset Boulevard	Commercial	Normally Acceptable	67.5
<b>Sunset Boulevard</b>			
Between Vine Street and Argyle Avenue	Commercial	Conditionally Acceptable	71.6
Between Argyle Avenue and Gower Street	Commercial	Conditionally Acceptable	71.6



**TABLE IV.I-6  
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS**

<b>Roadway Segment</b>	<b>Adjacent Land Use</b>	<b>Existing Noise Exposure Compatibility Category<sup>b,c</sup></b>	<b>Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way<sup>a</sup> 25 Feet</b>
<b>Cahuenga Boulevard</b>			
Between Franklin Avenue and Yucca Street	Residential/ Commercial	Normally Unacceptable	71.0
Between Yucca Street and Hollywood Boulevard	Commercial	Conditionally Acceptable	70.7
<b>Ivar Avenue</b>			
Between Yucca Street and Hollywood Boulevard	Commercial	Normally Acceptable	64.2
<b>Bronson Avenue</b>			
Between Franklin Avenue and Carlos Avenue	Residential/ Commercial	Conditionally Acceptable	66.2
Between Carlos Avenue and Hollywood Boulevard	Residential/ Commercial	Conditionally Acceptable	66.0
<b>Selma Avenue</b>			
Between Vine Street and Argyle Avenue	Residential/ Commercial	Conditionally Acceptable	61.7

<sup>a</sup> Calculated based on existing traffic volumes.

<sup>b</sup> Based on noise levels at 25 feet distance from the roadway and residential uses if residential uses are shown along roadways.

<sup>c</sup> See Table IV.I-4 for a description of the compatibility categories.

SOURCE: ESA, 2019.

To establish the noise prediction model's accuracy, a traffic model calibration test was performed between 11 A.M. and 12 P.M. on June 11, 2015. The road segments included in the calibration test were along Gower Street, between Yucca Street and Carlos Avenue and Yucca Street, between Argyle Avenue and Gower Street. At the noted locations, a 15-minute noise recording was made concurrent with the logging of actual traffic volumes and auto fleet mix (i.e., standard automobile, medium duty truck, or heavy-duty truck). The traffic counts were entered into the noise model along with the observed speed, lane configuration, and distance to the roadway to calculate the traffic noise levels. The results of the traffic noise model calibration are provided in **Table IV.I-7, Traffic Noise Model Calibration Results**. As indicated, the noise model results are within 1 dBA of the measured noise levels, which is within the industry standard tolerance of the noise



prediction model.<sup>60</sup> Therefore, the Project-specific traffic noise prediction model is considered accurate and reflective of the Project's physical setting.

**TABLE IV.I-7  
TRAFFIC NOISE MODEL CALIBRATION RESULTS**

Road Segment/ Noise Measurements Locations	Traffic Counts during noise readings, 15-minutes			Measured Traffic Noise Levels, L <sub>eq</sub> (dBA)	Project Traffic Noise Model Predicted Noise Levels, L <sub>eq</sub> (dBA)	Difference between Predicted and Measured Levels, dBA
	Autos	Medium Trucks <sup>a</sup>	Heavy Trucks <sup>b</sup>			
Gower Street	265	5	4	66.4	67.4	1.0
Yucca Street	80	1	0	62.1	61.3	-0.8

<sup>a</sup> Medium Truck – 2 axle trucks based on field observations.

<sup>b</sup> Heavy Truck – 3 or more axle trucks and buses based on field observations.

SOURCE: ESA, 2019.

#### (4) Groundborne Vibration-Sensitive Receptor Locations

Typically, groundborne vibration generated by man-made activities (i.e., rail and roadway traffic, operation of mechanical equipment and typical construction equipment) diminishes rapidly with distance from the vibration source.<sup>61</sup> The FTA *Transit Noise and Vibration Impact Assessment Manual* provides groundborne vibration structure damage criteria for: (1) reinforced-concrete, steel, or timber (no plaster); (2) engineered concrete and masonry (no plaster); (3) non-engineered timber and masonry buildings; (4) and buildings extremely susceptible to groundborne vibration damage.<sup>62</sup>

The FTA's document also provides groundborne vibration human annoyance criteria. The nearest off-site buildings to the Project Site that could be subjected to Project-related groundborne vibration structural damage and human annoyance impacts are the residential uses located along Vista Del Mar Avenue (less than 50 feet from the Project Site) because those residential uses are located within groundborne vibration and groundborne noise analysis screening distance by FTA<sup>63</sup> and have the potential to experience perceptible groundborne vibration due to short-term construction and long-term Project operations. These uses consist of non-engineered timber and masonry buildings that are residences where people normally sleep.

<sup>60</sup> California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. Provided in Appendix I of this Draft EIR.

<sup>61</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Section 7.2, page 182, 2018.

<sup>62</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, page 186, 2018

<sup>63</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Table 6-8, page 136, 2018.

### (5) Existing Groundborne Noise and 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 limited to heavy-duty vehicular travel (buses, etc.) on local roadways. Rubber-tired vehicles traveling at a distance of 50 feet from a receptor typically generate a groundborne vibration velocity levels of approximately 63 VdB (approximately 0.006 inches per second PPV).<sup>64</sup> Groundborne noise levels would generally be 35 to 37 decibels lower than the velocity level depending on the building land use category.<sup>65</sup>

## 3. Project Impacts

### a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a potentially significant impact related to noise and groundborne vibration 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?***

***Threshold (b): Generation of excessive groundborne vibration or groundborne noise levels?***

***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?***

In assessing the Project's potential impacts related to noise and groundborne vibration and noise in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) and the FTA's groundborne vibration and noise criteria for assessing potential impacts relating to building damage and human annoyance will be used where applicable and relevant to assist in analyzing the Appendix G questions. As discussed in Chapter VI (subsection Impacts Found not to be Significant) of this Draft EIR and in the Initial Study (Appendix A of this Draft EIR), the Project Site 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. No further analysis is required for item "c" of Appendix G.

<sup>64</sup> Federal Transit Authority, Transit Noise and Vibration Impact Assessment Manual, Figure 6-4, page 137, 2018.

<sup>65</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3, page 126, 2018.

*(a) Noise Levels**(i) Construction*

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA 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 or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA 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.

*(ii) Operation*

- The Project causes the ambient noise level measured at the property line of affected uses to increase 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA CNEL or greater noise increase (see Table IV.I-4).
- 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  $L_{eq}$ .

*(b) Groundborne Vibration and Groundborne Noise*

The Thresholds Guide does not include factors to assess groundborne vibration or noise impacts during construction or operation.

Thus, for this Project, the City has determined to use the FTA’s criteria, stated below, to evaluate potential groundborne vibration and noise impacts related to Project construction and operation.

- Potential Building Damage – Project construction activities cause groundborne vibration levels to exceed 0.2 inches per second PPV at the nearest off-site non-engineered timber and masonry buildings.<sup>66</sup>
- Potential Human Annoyance – Project construction and operational activities cause groundborne vibration and groundborne noise levels to exceed 72 VdB at nearby residential uses.<sup>67</sup>

<sup>66</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, 2018.

<sup>67</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3, 2018.

## b) Methodology

### (1) On-Site Construction Noise

On-site construction noise impacts were projected by determining the noise levels expected to be generated by the different types of construction activities anticipated, and calculating the construction-related noise levels produced by the construction equipment assumed at sensitive receptors. More, specifically, the following steps were undertaken to assess construction-period noise impacts.

- Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table IV.I-5);
- For each type of construction equipment expected to be used during each phase of construction, based on information provided by Webcore Builders, typical noise levels were obtained from the Federal Highway Administration (FHWA) roadway construction noise model (RCNM);
- Distances between construction site locations (noise sources) within the Project Site and surrounding sensitive receptors were measured using Project architectural drawings, Google Earth, and site plans;
- The construction noise levels were then calculated for each construction phase using the FHWA RCNM, conservatively, in terms of hourly  $L_{eq}$ , for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance, assuming that all of the equipment for each construction phase would be in use concurrently and that the loudest equipment would be located at the edge of the Project Site closest to the sensitive receptor locations; and
- Construction noise levels were then compared to the construction noise significance thresholds identified above.

### (2) Off-Site Roadway Noise (Construction and Operation)

Roadway noise levels were projected using the FHWA's Traffic Noise Model (TNM) methodology<sup>68</sup> and the roadway traffic volume provided in the Traffic Study for the Project provided in Appendix L-2 of this Draft EIR.<sup>69</sup> 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. For construction, Project-related noise along the three identified potential haul routes was analyzed.

<sup>68</sup> The noise prediction model which was developed based on calculation methodologies described in FHWA Traffic Noise Model Technical Manual (1998) and validated with the results from FHWA Traffic Noise Model Version 2.5. Available at: [file:///C:/Users/spalomera/Downloads/dot\\_10000\\_DS1%20\(1\).pdf](file:///C:/Users/spalomera/Downloads/dot_10000_DS1%20(1).pdf). Accessed September 2019.

<sup>69</sup> Gibson Transportation Consulting, Inc., Traffic Study for the 622 Yucca Street Mixed-Use Project, Hollywood, California, 2018. Provided in Appendix L-2 of this Draft EIR.

### (3) Stationary Point-Source Noise (Operation)

Stationary point-source noise levels at the Project Site were evaluated by first identifying the noise levels generated by the Project's open space areas, outdoor stationary noise sources such as rooftop mechanical equipment, parking structure automobile operations, and loading/refuse collection area activity, then calculating the hourly  $L_{eq}$  noise level from each noise source at sensitive receptor property lines, and then comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate the stationary point-source noise impacts:

- Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table IV.I-5);
- Typical noise levels generated by each type of stationary point-source noise generator, including mechanical equipment, open spaces, loading dock, and parking structure operations, were obtained from measured noise levels for similar equipment/activities, noise levels published in environmental noise assessment documents for land use development projects or scientific journals, or noise levels from equipment manufacturer specifications (see Appendix I, *Noise and Groundborne Vibration Technical Appendix*)
- Distances between stationary point-source noise generators and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;
- Stationary point-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
- Parking-related noise levels were estimated by using the methodology recommended by the FTA for the general assessment of stationary transit noise sources. Using this methodology, the peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking garage:<sup>70</sup>
  - $L_{eq}(h) = SEL_{ref} + 10\log(NA/1000) - 35.6$ , where:
    - $L_{eq}(h)$  = hourly  $L_{eq}$  noise level at 50 feet;
    - $SEL_{ref}$  = 92 dBA at 50 feet, 1,000 cars in peak activity hour at the center of a parking garage;
    - NA = number of automobiles per hour.
- Noise level increases, if any, were compared to the stationary point-source noise significance thresholds identified above; and
- For outdoor mechanical equipment, it was assumed that the Project would comply with the requirements of LAMC Section 112.02 to ensure that the maximum noise generated by any and all outdoor mechanical equipment would not exceed the

<sup>70</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 4-13 and Table 4-14, pages 45 and 47, 2018.

ambient noise level by more than 5 dBA, which falls within the significance threshold identified above.

#### (4) Composite Noise (Operations)

The combined noise levels from all operational noise sources were estimated by logarithmically adding together the noise levels from all of the operational noise sources at the maximally impacted noise-sensitive receptor locations, assuming the simultaneous contribution of noise from each source. As discussed previously, the dBA scale is based on logarithms, where a doubling of sound energy corresponds to a 3 dBA increase (e.g., if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA). The composite noise sources include off-site roadway noise and on-site noise sources. Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls and is thus addressed within the evaluation of groundborne vibration as discussed in the next subsection below.

#### (5) Groundborne Vibration and Noise (Construction and Operation)

Groundborne vibration and noise impacts were evaluated for potential building damage and human annoyance impacts by identifying the Project's potential vibration sources, estimating the maximum groundborne vibration and noise levels at the distances between the Project's vibration sources and the nearest structure and groundborne vibration annoyance receptor locations using vibration data from the FTA manual, and making a significance determination based on the significance thresholds described above.

Construction activities may generate groundborne vibration and noise from transient sources due to the temporary and sporadic use of groundborne vibration-generating equipment. Construction of the Project would have the potential to cause structure damage to off-site buildings that are located within 50 feet of the Project Site. Operation of the Project has no potential to cause structure damage to the Project's own buildings or to off-site buildings that are farther away because the Project would not include any equipment that would generate substantial groundborne vibration or noise levels. Construction and operational activities may generate groundborne vibration and noise levels that could be felt by people as a result of trucks and vehicles driving to and from the Project Site, or as the result of the operation of typical commercial-grade stationary mechanical and electrical equipment used for residential and commercial land uses, such as air handling units, condenser units, and exhaust fans, and that could cause annoyance because groundborne vibration and noise thresholds for human annoyance are much lower than groundborne vibration and noise thresholds for structural damage.

### c) Project Design Features

The following Project Design Feature would be incorporated into the Project to reduce its potential noise impacts.

**PDF-NOI-1:** Generators used during the construction process will be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.

**PDF-NOI-2:** The Project will not use impact pile drivers and will not allow blasting during construction activities.

### d) Analysis of Project Impacts

***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?***

#### (1) Construction Noise

##### (a) On-site Construction Noise

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment locations, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction is typically undertaken in five stages: (1) demolition; (2) site preparation; (3) grading; (4) building construction phase 1 (framing and structure); and (5) building construction phase 2 (paving/architectural coatings). Each stage involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics. Demolition typically involves the use of concrete saw, excavator, rubber-tired dozer, and tractor/loader/backhoe equipment. Site preparation typically involves the use of tractor/loader/backhoe and rubber-tired dozer equipment. Grading typically involves the use of excavator, rubber-tired loader, rubber-tired dozer, scraper, tractor/loader/backhoe, and drill rig truck equipment. Building construction 1 typically involves the use of crane, forklift, tractor/loader/backhoe, welder, pump, and generator set equipment. Paving, building construction 2, and architectural coatings typically involve the use of paver, paving equipment, roller, air compressor, tractor/loader/backhoe, and generator set equipment. As described above, based on information provided by Webcore Builders, the Project would be constructed using typical construction techniques in the typical five stages; however, as per PDF-NOI-2, no blasting or impact pile driving would be used. As discussed in Chapter II, *Project Description*, construction is anticipated to begin as early as 2020, with full build out and occupancy occurring as early as 2022.

As described above, Project construction would require the use of mobile heavy equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Project construction could 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-8, Construction Equipment Noise Levels**. These maximum noise levels would occur when the equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in Table IV.I-8. The usage factors are based on the FHWA's Roadway Construction Noise Model User's Guide.<sup>71</sup> To more accurately characterize construction-period noise levels, the average (Hourly  $L_{eq}$ ) noise level associated with each construction stage was calculated based on the quantity, type, and usage factors for each type of equipment expected to be used during each construction stage. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operating concurrently. The estimated noise levels at the off-site sensitive receptor locations were based on a scenario that assumed the maximum concurrent operation of equipment, which is considered to be a worst-case evaluation because Project construction would typically use less overall equipment on a daily basis, and as such would generate lower noise levels.

A summary of the construction noise impacts at the existing nearby sensitive receptors is provided in **Table IV.I-9, Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors**. Detailed noise calculations for construction activities are provided in Appendix I of this Draft EIR. As shown in Table IV.I-9, construction noise levels are estimated to reach a maximum of 106 dBA at the off-site receptor locations (represented by measurement location/sensitive receptor location R3) along west side of Vista Del Mar Avenue, 83 dBA at the receptor locations (represented by measurement location/sensitive receptor location R2) along Yucca Street, 82 dBA at the receptor locations (R1) along Argyle Avenue, and 69 dBA at the receptor locations (represented by measurement location/sensitive receptor location R4) along Carlos Avenue. Therefore, construction related activity noise levels would exceed the significance thresholds of 70 dBA at sensitive receptor location R1 (average daytime noise level of 65 dBA plus 5 dBA), 66 dBA at sensitive receptor location R2 (average daytime noise level of 61 dBA plus 5 dBA), 63 dBA at sensitive receptor location R3 (ambient noise level of 58 dBA plus 5 dBA), and 61 dBA at sensitive receptor location R4 (ambient noise level of 56 dBA plus 5 dBA). The ambient noise levels are shown in Table IV.I-5. **As such, the Project would exceed significance thresholds at residential uses located to the west of the Project Site along Argyle Avenue (R1), south and east of the Project Site along Vista Del Mar Avenue (R3), north of Yucca Street (R2), and north and south of Carlos Avenue (R4) and impacts would be significant. Therefore, mitigation is required and identified below.**

<sup>71</sup> Federal Highway Administration, Roadway Construction Noise Model User's Guide, Table 1, 2006.



**TABLE IV.I-8  
CONSTRUCTION EQUIPMENT NOISE LEVELS**

<b>Equipment</b>	<b>Estimated Usage Factor, %</b>	<b>Maximum Noise Level at 50 feet from Equipment, dBA (Lmax)</b>
Air Compressor	40	78
Concrete Saw	20	90
Crane	16	81
Drill Rig Truck	20	84
Dump/Haul Truck	40	76
Excavator	40	81
Forklift	10	75
Generator Set	50	81
Paving Equipment	20	90
Paver	50	77
Pump	50	81
Roller	20	80
Rubber Tired Dozer	40	82
Rubber Tired Loader	40	79
Scraper	40	84
Tractor/Loader/Backhoe	40	80
Water Trucks	10	80
Welder	40	74

SOURCE: FHWA Roadway Construction Noise Model User's Guide, 2006.

*(b) Off-Site Construction Traffic Noise*

Delivery and haul truck and worker trips would occur throughout the construction period, although no truck trips would occur between 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 anytime on Sunday. Construction-related traffic would use Argyle Avenue and Yucca Street because these roadways have direct access to the Project Site. An estimated round trip maximum of approximately 200 haul truck trips with approximately 26 trips per hour (13 inbound, 13 outbound) uniformly over a typical eight-hour workday and 20 worker trips would occur per day, based on the Traffic Study, during excavation. The excavation phase generates the most daily construction truck trips and thus represents the maximum off-site construction traffic noise conditions. Trucks traveling to and from the Project Site would be required to travel along the haul route ultimately approved by the City for the Project. However, three potential haul route options are being considered by the Project, which

are evaluated below. Noise calculation worksheets for construction traffic are provided in Appendix I of this Draft EIR.

**TABLE IV.I-9**  
**ESTIMATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS**

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a</sup> Hourly Leq (dBA)	Project's Significance Threshold <sup>b,c</sup> (dBA)	Exceeds Significance Threshold?
R1 Western Property Line near Multi- family Residential Uses	Demolition	80	81	70	Yes
	Site Preparation	80	76		Yes
	Grading	80	81		Yes
	Building Construction 1	80	79		Yes
	Paving/Architectural Coatings/ Building Construction 2	80	82		Yes
R2 Northern Property Line near Multi- family Residential and Hotel Uses	Demolition	65	83	66	Yes
	Site Preparation	65	78		Yes
	Grading	65	83		Yes
	Building Construction 1	65	81		Yes
	Paving/Architectural Coatings/ Building Construction 2	65	83		Yes
R3 Southeastern Property Line near Residential Uses along Vista Del Mar Avenue	Demolition	5	105	63	Yes
	Site Preparation	5	100		Yes
	Grading	5	105		Yes
	Building Construction 1	5	103		Yes
	Paving/Architectural Coatings/ Building Construction 2	5	106		Yes
R4 <sup>c</sup> Residential Uses south of Carlos Avenue	Demolition	190	69	61	Yes
	Site Preparation	190	64		Yes
	Grading	190	69		Yes
	Building Construction	190	66		Yes
	Paving/Architectural Coatings/ Building Construction 2	190	69		Yes

**TABLE IV.I-9  
ESTIMATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS**

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a</sup> Hourly Leq (dBA)	Project's Significance Threshold <sup>b,c</sup> (dBA)	Exceeds Significance Threshold?
R5 <sup>d</sup>	Demolition	380	53	76	No
Residential	Site Preparation	380	48		No
Uses west of Gower Street & south of Franklin Ave.	Grading	380	53		No
	Building Construction	380	50		No
	Paving/Architectural Coatings/ Building Construction 2	380	53		No

<sup>a</sup> Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors and are expected to last the entire duration of each construction phase.

<sup>b</sup> Significance Thresholds are the measured daytime noise levels shown in Table IV.I-5 plus 5 dBA.

<sup>c</sup> Receptors are partially shielded from the construction site by existing buildings; and such shielding is included in the analyses representing a 5 dBA reduction in noise levels.

<sup>d</sup> Receptors are fully shielded from the construction site by existing buildings; and such shielding is included in the analyses representing a 15 dBA reduction in noise levels

SOURCE: ESA, 2019.

Under Option 1, arriving haul truck traffic would exit US 101 southbound at Gower Street, travel south to Hollywood Boulevard, west to Argyle Avenue, north to the Project Site, and if necessary, east on Yucca Street to the appropriate staging area. To depart, the trucks would either travel north on Argyle Avenue to the US 101 northbound on-ramp at Franklin Avenue, or, if staging on Yucca Street, would travel south on Gower Street, west on Hollywood Boulevard, and north on Argyle Avenue to the on-ramp.

The Project's truck trips and worker trips would generate noise levels of approximately 61.0 dBA, Leq at an approximately 25-foot distance (from the closest edge of the roadway) along Gower Street, 60.6 dBA along Hollywood Boulevard and Franklin Avenue, and 61.5 dBA along Argyle Avenue and along Yucca Street.

As shown in Table IV.I-6, the existing noise levels along these streets are 67.6 dBA, Leq along Gower Street, 69.5 dBA, along Franklin Avenue, 69.5 dBA, Leq along Hollywood Boulevard, 65.7 dBA, Leq along Argyle Avenue, and 58.7 dBA, Leq along Yucca Street. Construction traffic noise levels generated by truck trips and worker trips would increase traffic noise levels along Gower Street by up to 0.9 dBA, along Franklin Avenue by up to 0.5 dBA, along Hollywood Boulevard by up to 0.5 dBA, along Argyle Avenue by up to 1.4 dBA, and along Yucca Street by up to 4.6 dBA. The noise level increases generated by

truck trips and worker trips would be below the significance threshold of 5 dBA. Therefore, off-site construction traffic noise impacts would be less than significant under Option 1.

Under Option 2, arriving haul truck traffic would exit US 101 southbound at Gower Street, travel south to Yucca Street, and west to the Site. Staging would be located on the south side of Yucca Street adjacent to the Project Site, and haul trucks would cross the striped center median on Yucca Street to enter. To depart, the trucks would exit the Site northward onto Argyle Avenue and proceed to the US 101 northbound on-ramp at Argyle Avenue and Franklin Avenue.

The Project's truck trips and worker trips would generate noise levels of approximately 61.0 dBA, Leq at an approximately 25-foot distance (from the closest edge of the roadway) along Gower Street, 60.6 dBA along Franklin Avenue, and 61.5 dBA, along Yucca Street and Argyle Avenue.

As shown in Table IV.I-6, the existing noise levels along these streets are 67.6 dBA, Leq along Gower Street, 69.5 dBA, along Franklin Avenue, 65.7 dBA, Leq along Argyle Avenue, and 58.7 dBA, Leq along Yucca Street. Construction traffic noise levels generated by truck trips and worker trips would increase traffic noise levels along Gower Street by up to 0.9 dBA, along Franklin Avenue by up to 0.5 dBA, along Argyle Avenue by up to 1.4 dBA, and along Yucca Street by up to 4.6 dBA. The noise level increases generated by truck trips and worker trips would be below the significance threshold of 5 dBA. Therefore, off-site construction traffic noise impacts would be less than significant under the Option 2.

Under Option 3, arriving haul truck traffic would exit US 101 southbound at Vine Street, travel south to Yucca Street, and east to the Site. To depart, the trucks would continue east on Yucca Street, turn north on Gower, turn west on Franklin Avenue, and use the US 101 northbound on-ramp at Argyle Avenue and Franklin Avenue.

The Project's truck trips and worker trips would generate noise levels of approximately 60.6 dBA, Leq at an approximately 25-foot distance (from the closest edge of the roadway) along Franklin Avenue and Vine Street, 61.5 dBA along Yucca Street, and 61.0 dBA along Gower Street.

As shown in Table IV.I-6, the existing noise levels along these streets are 69.5 dBA along Franklin Avenue, 67.5 dBA along Vine Street, 58.7 dBA, Leq along Yucca Street, and 67.6 dBA, Leq along Gower Street. Construction traffic noise levels generated by truck trips and worker trips would increase traffic noise levels along Franklin Avenue by up to 0.5 dBA, along Vine Street by up to 0.8 dBA, along Yucca Street by up to 4.6 dBA, along Gower Street by up to 0.9 dBA, and. The noise level increases generated by truck trips and worker trips would be below the significance threshold of 5 dBA. Therefore, off-site construction traffic noise impacts would be less than significant under Option 3.

**As shown above, off-site construction traffic noise impacts would be less than significant under all three potential haul route options. As such, no mitigation measures are required.**

## (2) Operational Noise Impacts

### (a) *Potential Impacts from On-site Stationary Noise Sources*

#### (i) *Fixed Mechanical Equipment*

The operation of mechanical equipment such as air conditioners, fans, and related equipment may generate audible noise levels. Mechanical equipment is typically located on rooftops or within buildings, and is shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. All of the Project's mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screen/parapet walls in order to comply with noise limitation requirements provided in Section 112.02 of the LAMC, which compliance prevents the noise from such equipment from causing an increase in the ambient noise level by more than 5 dBA. To meet this standard, the noise from the Project equipment must be at least 10 dBA below ambient noise levels, as noise levels lower than ambient conditions can contribute to the general ambient sound level. The Project would install mechanical equipment that would generate noise levels below this threshold consistent with applicable regulatory requirements. **Therefore, operation of the Project's mechanical equipment would not exceed the City's thresholds of significance and impacts are less than significant. As such, no mitigation measures would be required.**

#### (ii) *Outdoor/Open Space Activity*

**Building 1** - Building 1 would include a gym with an adjacent outdoor synthetic lawn/workout space, a restaurant/bar with outdoor seating, a pool and a spa surrounded by a deck, and a podium courtyard on Level 4 to be shared by both hotel guests and residents. The courtyard would be equipped with lounge seats, an active lounge, gas fire pit and lounge, BBQ, and dining tables and chairs. Building 1 would also include a pool/roof garden space and small bar on Level 20. Building 2 would include a roof garden on Level 4.

The podium courtyard on Level 4 of Building 1, located approximately 50 feet above ground, would be a potential noise source for the closest residential uses at sensitive receptor locations R1 and R2, which are located approximately 80 and 65 feet away from the Project Site boundary. Under a conservative scenario, there could be up to approximately 248 visitors on the podium courtyard at one time on a peak weekend day.<sup>72</sup> The noise level from human conversation reaches approximately 55 dBA per

<sup>72</sup> The podium courtyard area is approximately 7,440 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, this courtyard area could accommodate approximately 496 people. However, with tables, chairs and benches provided during an event with that number of people, an estimate of approximately 248 people is provided, which assumes half of the spaces would be filled with furniture and/or other non-occupied space.

person (speaking) at a distance of 3 feet.<sup>73</sup> Assuming 124 visitors would be talking simultaneously, the continuous noise level could be up to approximately 76 dBA at 3 feet. Based on a noise level of 76 dBA at a reference distance of 3 feet, and accounting for distance attenuation (29 dBA at R1 and 26 dBA at R2), the podium courtyard noise level would be 47 dBA at the R1 noise sensitive receptors along Argyle Avenue, which would not exceed the significance threshold of 70 dBA, and 50 dBA at the R2 noise sensitive receptors along Yucca Street, which would not exceed the significance threshold of 66 dBA.<sup>74</sup> **Therefore, the podium courtyard operations would not result in a substantial increase in ambient noise levels, and impacts would be less than significant.**

The pool deck on Level 4 would also be located approximately 50 feet above ground, and approximately 160 feet from the nearest residential uses at sensitive receptor location R3 and approximately 50 feet from the nearest residential uses at sensitive receptor location R4. The pool deck would serve as a potential noise source for sensitive receptor locations R3 and R4. Under a conservative scenario, there could be up to approximately 106 visitors on the 4<sup>th</sup> Level podium pool deck at one time on a peak weekend day.<sup>75</sup> The noise level from human conversation reaches approximately 55 dBA per person (speaking) at a distance of 3 feet.<sup>76</sup> Assuming 53 visitors would be talking simultaneously, the continuous noise level could be up to 72 dBA at 3 feet. Based on a noise level of 72 dBA at a reference distance of 3 feet, and accounting for distance attenuation (35 dBA at R3 and 24 dBA at R4), the pool deck noise level would be 37 dBA at the noise sensitive receptors along Vista Del Mar Avenue (sensitive receptor location R3) and 48 dBA at the noise sensitive receptors along Carlos Avenue (sensitive receptor location R4) and would not exceed the significance thresholds of 63 dBA at R3 and 61 dBA at R4, respectively.<sup>77</sup> **Therefore, pool deck operations would not exceed the significance threshold, and impacts would be less than significant. As such, no mitigation measures are required.**

The pool/roof garden would be located on Level 20, approximately 220 feet above ground. The nearest residential uses (measurement location/sensitive receptor location R2) along Yucca Street would be located approximately 60 lateral feet from the pool/roof garden on Level 20. Therefore, the pool/roof garden would be located approximately 228 feet from

<sup>73</sup> American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012). <https://aja.pubs.asha.org/article.aspx?articleid=1773811>, accessed July 2019.

<sup>74</sup> The open space noise levels of 47 dBA at R1 and 50 dBA at R2 would be less than the existing ambient noise levels by more than 10 dBA at both locations; therefore, it would not contribute an audible increase in the existing ambient noise levels at R1 or R2.

<sup>75</sup> The pool deck area is approximately 3,170 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, approximately 211 people could potentially occupy the space. However, with tables, chairs and benches provided during an event with that number of people, an estimate of approximately 106 people is provided, which assumes half of the spaces would be filled with furniture and/or other non-occupied space.

<sup>76</sup> American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012). <https://aja.pubs.asha.org/article.aspx?articleid=1773811>, accessed July 2019.

<sup>77</sup> The open space noise levels of 48 dBA at R3 and 39 dBA at R4 would be less than the existing ambient noise levels by more than 10 dBA at both locations; therefore, it would not contribute an audible increase in the existing ambient noise levels at R3 or R4.

the nearest residential uses (measurement location/sensitive receptor location R2) along Yucca Street. Under a conservative scenario, there could be up to approximately 125 visitors on the pool/roof garden area at one time on a peak weekend day.<sup>78</sup> The noise levels generated by rooftop-related activities of approximately 125 people could be as high as 73 dBA at 3 feet from the boundary of the rooftop, assuming that 62 visitors would be talking simultaneously. Accounting for distance attenuation (minimum 38 dBA loss), noise levels are expected to contribute no more than 35 dBA at the nearest sensitive receptor (measurement location/sensitive receptor location R2) and would not exceed the significance threshold of 5 dBA over ambient noise levels.<sup>79</sup> **Therefore, noise impacts associated with the pool/roof garden area are less than significant. As such, no mitigation measures are required.**

**Building 2** - Building 2 would include a roof garden on Level 4, located approximately 50 feet from the nearest residential uses (measurement location/sensitive receptor location R3) across Vista Del Mar to the east. Under a conservative scenario, there could be up to approximately 29 visitors on the roof garden at one time on a peak weekend day.<sup>80</sup> The noise level from human conversation reaches approximately 55 dBA per person (speaking) at a distance of 3 feet.<sup>81</sup> Assuming 15 visitors would be talking simultaneously, the continuous noise level would be up to 67 dBA at 3 feet. Based on a noise level of 67 dBA at a reference distance of 3 feet, and accounting for distance attenuation (24 dBA), the roof garden noise level would be 43 dBA at the noise sensitive receptors along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) and would not exceed the significance threshold of 63 dBA.<sup>82</sup>

**Therefore, outdoor/open space activities would not exceed the significance threshold, and impacts would be less than significant. As such, no mitigation measures are required.**

<sup>78</sup> The pool/roof garden area is approximately 3,740 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, approximately 249 people could potentially occupy this space. However, with tables, chairs and benches provided during an event with that number of people, an estimate of approximately 125 people is provided, which assumes half of the spaces would be filled with furniture and/or other non-occupied space.

<sup>79</sup> The open space noise level of 35 dBA at R2 would be less than the existing ambient noise levels by more than 10 dBA at R2; therefore, it would not contribute an audible increase in the existing ambient noise level at R2.

<sup>80</sup> The roof garden area is approximately 875 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, approximately 58 people could potentially occupy the space. However, with tables, chairs and benches provided during an event with that number of people, an estimate of approximately 29 people is provided, which assumes half of the spaces would be filled with furniture and/or other non-occupied space.

<sup>81</sup> American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012). <https://aja.pubs.asha.org/article.aspx?articleid=1773811>, accessed July 2019.

<sup>82</sup> The open space noise level of 43 dBA at R3 would be less than the existing ambient noise levels by more than 10 dBA at R3; therefore, it would not contribute an audible increase in the existing ambient noise level at R3.

(iii) *Loading Dock and Refuse Collection Areas*

Loading, recycling, trash removal, and collection for the residential, hotel, and commercial/restaurant uses within Building 1 would occur in designated areas within the interior areas of the P1 Level near the parking entrance off of Argyle Avenue such that noise impacts to nearby residents would be minimized.

For Building 2, trash collection and recycling for the residential uses would occur in a designated area within the P1 Level. It is anticipated that any moving trucks would temporarily park along Vista Del Mar when residents are moving in or out. Loading/deliveries for residential uses would also occur within the P1 level and would utilize a dedicated residential freight elevator on the P1 Level for Building 2.

Loading dock and refuse collection areas activities such as truck movements/idling and loading/unloading operations generate noise levels that have a potential to adversely impact adjacent land uses during long-term Project operations. Based on a noise survey that was conducted at a loading dock facility by ESA, loading dock activity (namely idling semi-trucks and backup alarm beeps) would generate noise levels of approximately 70 dBA  $L_{eq}$  at a reference distance of 50 feet from the noisiest portion of the truck (i.e., to the side behind the cab and in line with the engine and exhaust stacks).<sup>83</sup>

For Building 1, loading dock and refuse service areas would be located within the P1 level. The east side of the parking structure from the P1 up to the 3rd Level for Building 1 will have no openings. In addition, the south side of the exterior Building 1 wall from at least 50 feet as measured from the southeastern corner of the Building 1 parking structure (towards the center of the Project Site) from the P1 Level up to the 3rd Level will also have no openings, in order to block the line of sight to the residential uses along the west side of Vista Del Mar Avenue. Based on a noise source level of 66 dBA at a reference distance of 80 feet for noise sensitive receptor R1, and a noise level of 60 dBA at a reference distance of 160 feet for noise sensitive receptor R4, accounting for barrier-insertion loss by the Project buildings (minimum 40 dBA insertion loss), the loading dock and refuse service noise levels would be approximately 26 dBA  $L_{eq}$  at the noise-sensitive uses represented by R1 and 20 dBA  $L_{eq}$  at noise-sensitive uses represented by R4, of which such levels would be inaudible because they would be at least 10 dBA below the existing ambient noise levels at R1 and R4, and therefore would not exceed the significance thresholds of 70 dBA at R1 and 61 dBA at R4, respectively.

For Building 2, dumpsters would be wheeled manually from the trash collection areas within the P1 Level to the curbside along Vista Del Mar Avenue. The moving of trash and recycling bins manually would generate noise levels of approximately 60 dBA ( $L_{max}$ ) at a

<sup>83</sup> The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM) in June 15, 2016. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade. See Appendix I for the supporting documents.



3-foot distance.<sup>84</sup> The nearest noise-sensitive uses on the east side of the Project Site, represented by measurement location R3 (residential uses along Vista Del Mar Avenue), would be located approximately 15 feet from the refuse service activities. Based on a noise level source strength of 60 dBA at a reference distance of 3 feet, and accounting for distance attenuation (minimum 15 dBA insertion loss), the noise level generated by moving the trash and recycling bins would be approximately 46 dBA at these noise-sensitive uses along Vista Del Mar Avenue and therefore would not exceed the significance threshold of 63 dBA.<sup>85</sup> **Therefore, loading dock and refuse collection areas operations would not exceed the significance threshold, and impacts would be less than significant. As such, no mitigation measures would be required.**

#### (iv) *Parking Structure*

The Project would provide a total of 436 vehicle parking spaces in Buildings 1 and 2. Parking for Building 1 would be provided within the six-level parking structure housed within its podium [two subterranean levels (P2 and P3); two semi-subterranean levels (P1 and L1); and two fully above ground levels (L2 and L3)]. Parking for Building 2 would be provided in its two-level podium structure within the semi-subterranean level (P1) and one subterranean level (P2).

Sources of noise associated with parking areas typically include engines accelerating, doors slamming, car alarms, horns honking, tire squeals, and people talking. Noise levels at these facilities would fluctuate throughout the day with the amount of vehicle and human activity. Noise levels would generally be the highest during the morning and evening peak traffic hours when the largest number of vehicles would enter and exit the parking structures.

Although the residential uses would be provided with private garage parking and there are a total of three access driveways, for the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated by vehicles entering and exiting the Project Site, the methodology recommended by FTA for the general assessment of parking-related noise sources was used, as discussed in the Methodology Section.

Based on the Project's Traffic Study provided in Appendix L-2 of this Draft EIR, the Project is forecasted to generate 2,897 daily vehicle trips, including an anticipated 218 trips and 238 trips during the A.M. and P.M. peak hours. The 238 P.M. peak hour trips were then proportioned based on land use type and number of entrances, such that approximately 116 trips are expected to use the north entrance driveway on Yucca Street to access Building 1 parking, approximately 116 trips are expected to use the west entrance

<sup>84</sup> Moving of trash and recycling bins noise measurements were conducted at a refuse service area at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM) in June 15, 2016. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade. See Appendix I for the supporting documents.

<sup>85</sup> The noise level of 46 dBA at R3 would be less than the existing ambient noise levels by more than 10 dBA at R3; therefore, it would not contribute an audible increase in the existing ambient noise level at R3.

driveway on Argyle Avenue to access Building 1 parking, and approximately 7 trips are expected to use the east side entrance driveway on Vista Del Mar to access Building 2 parking. Using the FTA's reference noise level of 92 dBA SEL<sup>86</sup> at 50 feet from the noise source for a parking lot, assuming the trip volumes mentioned previously, the noise levels would be approximately 47 dBA  $L_{eq}$  at 50 feet for the north entrance driveway on Yucca Street to access Building 1 parking, approximately 47 dBA  $L_{eq}$  at 50 feet for the west entrance driveway on Argyle Avenue to access Building 1 parking, and approximately 35 dBA  $L_{eq}$  at 50 feet for the east side entrance driveway on Vista Del Mar to access Building 2 parking. These calculated noise levels assume no noise attenuation from walls, partial screens, or other barriers, and thus are very conservative estimates.

The north entrance driveway on Yucca Street to access Building 1 parking is located approximately 80 feet from noise-sensitive uses at sensitive receptor location R1, the west entrance driveway on Argyle Avenue to access Building 1 parking is approximately 65 feet from noise-sensitive uses at sensitive receptor location R2. The north entrance driveway on Yucca Street to access Building 1 parking is located approximately and the east entrance driveway on Vista Del Mar to access Building 2 parking are approximately 100 feet and 10 feet, respectively, from noise-sensitive uses at sensitive receptor location R3, and the west entrance driveway on Argyle Avenue to access Building 1 parking and the east entrance driveway on Vista Del Mar to access Building 2 parking are located approximately 180 feet and 210 feet, respectively, from noise-sensitive uses at sensitive receptor location R4. Therefore, adjusting for these distances, the parking structure vehicle-related noise levels would be approximately 43 dBA  $L_{eq}$  at sensitive receptor location R1, 45 dBA  $L_{eq}$  at sensitive receptor location R2, 53 dBA  $L_{eq}$  at sensitive receptor location R3, and 36 dBA  $L_{eq}$  at sensitive receptor location R4. These noise levels are well below the existing noise levels of 65 dBA  $L_{eq}$ , 61 dBA  $L_{eq}$ , 58 dBA  $L_{eq}$  and 56 dBA  $L_{eq}$ , respectively, and which would not audibly increase the ambient noise level sensitive receptor locations at R1, R2, or R4,<sup>87</sup> but would increase the noise level at sensitive receptor location R3 by 1.2 dBA. The noise level increase of 1.2 dBA at R3 would not exceed the significance threshold. **Because the parking structure vehicle-related noise would not increase ambient noise levels at the noise sensitive receptor locations R1, R2, R3, or R4 by the applicable 3 dBA or 5 dBA threshold, respectively, impacts would be less than significant, and no mitigation measures are required.**

#### (v) *Emergency Generator*

The Project would include an on-site emergency generator. The emergency generator is anticipated to be located on the P1 level of Building 1, approximately 75 feet from Argyle Avenue and along the southern perimeter of Building 1. The emergency generator is assumed to be rated at approximately 250 kilowatts (approximately 335 horsepower). The emergency generator may be used in the event of a power outage to provide electricity

<sup>86</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 4-13 and Table 4-14, pages 45 and 47, 2018.

<sup>87</sup> The noise levels of 43 dBA at R1, 45 dBA at R2, and 36 dBA at R4 would be less than the existing ambient noise levels by more than 10 dBA at these locations; therefore, it would not contribute an audible increase in the existing ambient noise level at R1, R2, and R4.

for emergency safety lighting and other electrical needs. Maintenance and testing of the emergency generator would not occur daily, but rather periodically, up to 50 hours per year per South Coast Air Quality Management District Rule 1470.

The emergency generator is anticipated to be located approximately 155 feet from the multi-family residential uses to the west side of Argyle Avenue (R1) and approximately 200 feet from the noise-sensitive uses to the south side of Carlos Avenue (R4). Other off-site noise-sensitive receptors would be farther away or would not have a line-of-sight to the emergency generator and would be less impacted by noise from this source. Based on a noise survey that was conducted for an equivalent generator by ESA, noise from the emergency generator would be approximately 96 dBA ( $L_{eq}$ ) at 25 feet.<sup>88</sup> Noise from the emergency generator would be approximately 80 dBA at 155 feet (R1) and 78 dBA at 200 feet (R4), which would exceed the existing ambient noise levels at these locations. The combined noise level from the emergency generator plus the existing ambient noise levels (65 dBA at R1 and 56 dBA at R4) would be approximately 80 dBA at R1 and 78 dBA at R4, which would exceed the significance threshold. The off-site residential uses and hotel uses on the north side of Yucca Street (R2) located approximately 160 feet from the emergency generator and the residential uses to the east and southeast of the Project Site along Vista Del Mar Avenue (R3) located approximately 300 feet from the emergency generator, while located near to the Project Site, would not have a line-of-sight to the emergency generator. For locations R2 and R3, the Project building would act as a noise enclosure and substantially shield the emergency generator noise by at least 34 dBA.<sup>89</sup> Given distance attenuation and noise shielding effects, the emergency generator noise at R2 would be 46 dBA  $L_{eq}$  and at R3 would be 40 dBA  $L_{eq}$ , respectively, which would not exceed the ambient noise levels at R2 and R3 of 61 dBA and 58 dBA. **Therefore, noise impacts would be potentially significant at the nearest noise sensitive receptors (R1 and R4) located 155 feet and 200 feet away, respectively. Mitigation is required and identified below.**

(b) *Off-site Project Traffic*

(i) *Impacts Under Existing Traffic Baseline Conditions*

Existing roadway noise levels were calculated along various roadway segments near the Project Site. Roadway noise attributable to Project development was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the “No Project” condition.

<sup>88</sup> The generator noise measurements were conducted at a Verizon facility using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM) in November 2000. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade. See Appendix I for the supporting documents.

<sup>89</sup> Federal Highway Administration, Noise Barrier Design Handbook, Acoustical Considerations, 2017, [https://www.fhwa.dot.gov/environment/noise/noise\\_barriers/design\\_construction/design/design03.cfm](https://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/design/design03.cfm). Accessed October 2019. Noise shielding based on the transmission loss for concrete enclosure.

Project impacts are shown in **Table IV.I-10, Off-Site Traffic Noise Impacts – Existing Baseline Conditions**. As shown, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 1.9 dBA CNEL, which would occur along Yucca Street, between Argyle Avenue and Gower Street. This increase in noise level would be well below a “clearly noticeable” increase of 5.0 dBA CNEL in an area characterized by conditionally acceptable noise levels (see Table IV.I-4 for a description of the land use compatibility categories for community noise), and the increase in sound level would be substantially lower at the remaining roadway segments analyzed. **Therefore, off-site Project-related traffic noise increases would be less than the applicable threshold and therefore less than significant, and no mitigation measures are required.**

**TABLE IV.I-10  
OFF-SITE TRAFFIC NOISE IMPACTS – EXISTING BASELINE CONDITIONS**

		Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			
Roadway Segment	Adjacent Land Use	Existing <sup>a</sup> (A)	Existing with Project <sup>b</sup> (B)	Project Increment (B - A)	Exceed Threshold?
Franklin Avenue					
Between Cahuenga Boulevard and Vine Street	Residential/ Commercial	68.3	68.3	0.0	No
Between Argyle Avenue and Gower Street	Residential/ Commercial	69.9	70.0	0.1	No
Between Gower Street and Beachwood Drive	Residential/ Commercial	70.2	70.2	0.0	No
Between Beachwood Drive and Bronson Avenue	Residential/ Commercial	70.0	70.0	0.0	No
Yucca Street					
Between Cahuenga Boulevard and Ivar Avenue	Commercial	64.5	64.6	0.1	No
Between Ivar Avenue and Vine Street	Commercial	65.2	65.3	0.1	No
Between Vine Street and Argyle Avenue	Commercial	63.8	64.2	0.4	No
Between Argyle Avenue and Gower Street	Residential/ Commercial	60.9	62.8	1.9	No
Hollywood Boulevard					
Between Cahuenga Boulevard and Ivar Avenue	Commercial	68.7	68.7	0.0	No
Between Ivar Avenue and Vine Street	Commercial	68.8	68.9	0.1	No

**TABLE IV.I-10  
OFF-SITE TRAFFIC NOISE IMPACTS – EXISTING BASELINE CONDITIONS**

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			
		Existing <sup>a</sup> (A)	Existing with Project <sup>b</sup> (B)	Project Increment (B - A)	Exceed Threshold?
Between Vine Street and Argyle Avenue	Residential/ Commercial	69.2	69.2	0.0	No
Between Argyle Avenue and Gower Street	Residential/ Commercial	69.6	69.6	0.0	No
Between Gower Street and Bronson Avenue	Commercial	68.8	68.8	0.0	No
<b>Argyle Avenue</b>					
Between Franklin Avenue and Yucca Street	Commercial	66.6	66.8	0.2	No
Between Yucca Street and Hollywood Boulevard	Residential/ Commercial	65.7	65.9	0.2	No
Between Hollywood Boulevard and Selma Avenue	Residential/ Commercial	65.8	65.9	0.1	No
Between Selma Avenue and Sunset Boulevard	Residential/ Commercial	63.7	63.8	0.1	No
<b>Vine Street</b>					
Between Franklin Avenue and Yucca Street	Residential/ Commercial	68.8	68.9	0.1	No
Between Yucca Street and Hollywood Boulevard	Commercial	69.5	69.5	0.0	No
Between Hollywood Boulevard and Selma Avenue	Residential/ Commercial	69.8	69.9	0.1	No
Between Selma Avenue and Sunset Boulevard	Residential/ Commercial	70.1	70.1	0.0	No
<b>Gower Street</b>					
Between Franklin Avenue and Yucca Street	Residential/ Commercial	68.4	68.5	0.1	No
Between Yucca Street and Hollywood Boulevard	Residential/ Commercial	67.8	68.0	0.2	No
Between Hollywood Boulevard and Sunset Boulevard	Commercial	67.5	67.5	0.0	No

**TABLE IV.I-10  
OFF-SITE TRAFFIC NOISE IMPACTS – EXISTING BASELINE CONDITIONS**

		Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			
Roadway Segment	Adjacent Land Use	Existing <sup>a</sup> (A)	Existing with Project <sup>b</sup> (B)	Project Increment (B - A)	Exceed Threshold?
<b>Sunset Boulevard</b>					
Between Vine Street and Argyle Avenue	Commercial	71.6	71.6	0.0	No
Between Argyle Avenue and Gower Street	Commercial	71.6	71.6	0.0	No
<b>Cahuenga Boulevard</b>					
Between Franklin Avenue and Yucca Street	Residential/ Commercial	71.0	71.0	0.0	No
Between Yucca Street and Hollywood Boulevard	Commercial	70.7	70.7	0.0	No
<b>Ivar Avenue</b>					
Between Yucca Street and Hollywood Boulevard	Commercial	64.2	64.2	0.0	No
<b>Bronson Avenue</b>					
Between Franklin Avenue and Carlos Avenue	Residential/ Commercial	66.2	66.2	0.0	No
Between Carlos Avenue and Hollywood Boulevard	Residential/ Commercial	66.0	66.0	0.0	No
<b>Selma Avenue</b>					
Between Vine Street and Argyle Avenue	Residential/ Commercial	61.7	61.7	0.0	No

<sup>a</sup> Existing data is taken from Table IV.I-6.

SOURCE: ESA, 2019.

*(ii) Impacts Under Future Traffic Conditions*

Future (2022) roadway noise levels were also calculated along various roadway segments near the Project Site to establish future baseline traffic noise levels that would occur with implementation of the related projects, to which the Project's off-site traffic noise during operations could be added. Project impacts are shown in **Table IV.I-11, Off-Site Traffic Noise Impacts – Future 2022 Conditions**. As indicated, the maximum increase in Project-related traffic noise levels over the future traffic noise levels would be 3.0 dBA CNEL, which would occur along Yucca Street, between Argyle Avenue and Gower Street. This increase in noise level would be less than a “clearly noticeable” increase of 5.0 dBA

CNEL in an area characterized by conditionally acceptable noise levels (see Table IV.I-4 for a description of the land use compatibility categories for community noise), and the increase in noise would be substantially lower at the remaining roadway segments analyzed. **Therefore, off-site Project-related traffic noise increases, when measured against the 2022 conditions, would be less than the applicable threshold and therefore less than significant.**

**TABLE IV.I-11  
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE 2022 CONDITIONS**

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			Future Project Increment <sup>c</sup> (C-B)	Cumulative Increment (C-A)	Exceed Threshold?
	Existing (A)	Future No Project <sup>a</sup> (B)	Future with Project <sup>b</sup> (C)			
Franklin Avenue						
Between Cahuenga Boulevard and Vine Street	68.3	69.2	69.2	0.0	0.9	No
Between Argyle Avenue and Gower Street	69.9	70.5	70.5	0.0	0.6	No
Between Gower Street and Beachwood Drive	70.2	70.6	70.6	0.0	0.4	No
Between Beachwood Drive and Bronson Avenue	70.0	70.4	70.4	0.0	0.4	No
Yucca Street						
Between Cahuenga Boulevard and Ivar Avenue	64.5	65.4	65.6	0.2	1.1	No
Between Ivar Avenue and Vine Street	65.2	65.9	66.0	0.1	0.8	No
Between Vine Street and Argyle Avenue	63.8	65.2	65.5	0.3	1.7	No
Between Argyle Avenue and Gower Street	60.9	62.5	63.9	1.4	3.0	No
Hollywood Boulevard						
Between Cahuenga Boulevard and Ivar Avenue	68.7	70.4	70.4	0.0	1.7	No
Between Ivar Avenue and Vine Street	68.8	70.6	70.6	0.0	1.8	No
Between Vine Street and Argyle Avenue	69.2	70.7	70.8	0.1	1.6	No

**TABLE IV.I-11**  
**OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE 2022 CONDITIONS**

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			Future Project Increment <sup>c</sup> (C-B)	Cumulative Increment (C-A)	Exceed Threshold?
	Existing (A)	Future No Project <sup>a</sup> (B)	Future with Project <sup>b</sup> (C)			
Between Argyle Avenue and Gower Street	69.6	70.9	70.9	0.0	1.3	No
Between Gower Street and Bronson Avenue	68.8	70.6	70.6	0.0	1.8	No
<b>Argyle Avenue</b>						
Between Franklin Avenue and Yucca Street	66.6	67.3	67.5	0.2	0.9	No
Between Yucca Street and Hollywood Boulevard	65.7	66.6	66.7	0.1	1.0	No
Between Hollywood Boulevard and Selma Avenue	65.8	66.3	66.4	0.1	0.6	No
Between Selma Avenue and Sunset Boulevard	63.7	64.4	64.5	0.1	0.8	No
<b>Vine Street</b>						
Between Franklin Avenue and Yucca Street	68.8	69.6	69.6	0.0	0.8	No
Between Yucca Street and Hollywood Boulevard	69.5	70.5	70.5	0.0	1.0	No
Between Hollywood Boulevard and Selma Avenue	69.8	70.6	70.7	0.1	0.9	No
Between Selma Avenue and Sunset Boulevard	70.1	70.9	71.0	0.1	0.9	No
<b>Gower Street</b>						
Between Franklin Avenue and Yucca Street	68.4	69.0	69.1	0.1	0.7	No
Between Yucca Street and Hollywood Boulevard	67.8	68.5	68.7	0.2	0.9	No



**TABLE IV.I-11  
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE 2022 CONDITIONS**

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			Future Project Increment <sup>c</sup> (C-B)	Cumulative Increment (C-A)	Exceed Threshold?
	Existing (A)	Future No Project <sup>a</sup> (B)	Future with Project <sup>b</sup> (C)			
Between Hollywood Boulevard and Sunset Boulevard	67.5	68.8	68.8	0.0	1.3	No
<b>Sunset Boulevard</b>						
Between Vine Street and Argyle Avenue	71.6	73.4	73.4	0.0	1.8	No
Between Argyle Avenue and Gower Street	71.6	73.4	73.4	0.0	1.8	No
<b>Cahuenga Boulevard</b>						
Between Franklin Avenue and Yucca Street	71.0	71.9	72.0	0.1	1.0	No
Between Yucca Street and Hollywood Boulevard	70.7	71.6	71.6	0.0	0.9	No
<b>Ivar Avenue</b>						
Between Yucca Street and Hollywood Boulevard	64.2	64.4	64.4	0.0	0.2	No
<b>Bronson Avenue</b>						
Between Franklin Avenue and Carlos Avenue	66.2	66.5	66.5	0.0	0.3	No
Between Carlos Avenue and Hollywood Boulevard	66.0	66.3	66.3	0.0	0.3	No
<b>Selma Avenue</b>						
Between Vine Street and Argyle Avenue	61.7	62.5	62.5	0.0	0.8	No

<sup>a</sup> Includes future growth plus related projects.

<sup>b</sup> Includes future growth plus related projects and Project traffic.

<sup>c</sup> Increase due to Project-related traffic only at Project build-out.

SOURCE: ESA, 2019.

(c) *Composite Noise Level Impacts from Proposed Project Operations*

An evaluation of the combined noise from the Project's various noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. Noise sources associated with the Project would include traffic on nearby roadways, automobile movement noise in the parking structures, outdoor/open space noise, loading dock and refuse service areas, emergency generator, and on-site mechanical equipment.

The maximum composite noise impacts would generally be expected near the Project Site boundary. As shown in Table IV.I-12, *Unmitigated Composite Noise Levels at Sensitive Receptor Locations R1 and R4 from Project Operation*, the composite noise levels are dominated by the emergency generator, which would be located on the P1 level of Building 1, approximately 75 feet from Argyle Avenue and along the southern perimeter of Building 1. The maximum composite noise impacts are expected to occur at noise-sensitive receptors at measurement locations R1 and R4. Location R1 represents uses located across Argyle Avenue that could experience composite noise from the Project's emergency generator, Podium Courtyard (4<sup>th</sup> level), and Building 1 parking access as well as from traffic on Argyle Avenue. Location R4 represents uses located adjacent to the south of the Project Site that could experience composite noise from the Project's emergency generator, Podium Pool Deck (4<sup>th</sup> level), and Building 2 parking access as well as from traffic on Vista Del Mar and Carlos Avenue. Locations R2 and R3 to the north and west of the Project Site would be less affected by composite noise because the Project buildings would provide a buffer from composite noise from the emergency generator and also would be situated further away from the Podium Pool Deck (for R2 and R3) and the Podium Courtyard (for R3).

Since the composite noise levels are dominated by the emergency generator noise, locations R1 and R4 represent the maximum impacted sensitive receptors for composite noise. Composite noise levels for locations R1, R2, R3, and R4 are based on the operational noise analyses provided in subsection 3.d)(2), *Operational Noise Impacts*.

As shown in **Table IV.I-12, *Unmitigated Composite Noise Levels at Sensitive Receptor Locations R1, R2, R3, and R4 from Project Operation***, the primary contributors to composite noise levels would be the emergency generator and traffic noise. The operation of an emergency generator would contribute a maximum of 80 dBA at the sensitive receptor location R1 and a maximum of 78 dBA at sensitive location R4. Due to distance attenuation and noise shielding effects, the emergency generator would contribute a maximum of 46 dBA at the sensitive receptor location R2 and a maximum of 40 dBA at sensitive location R3. Project-related peak hour traffic noise levels would range from approximately 53.6 dBA ( $L_{eq}$ ) at sensitive receptor locations R1 and R4 and approximately 57.9 dBA ( $L_{eq}$ ) at sensitive receptor locations R2 and R3. The composite noise levels from the operation of the Project would be up to 80.2 dBA at sensitive receptor location R1, up to 63.4 dBA at sensitive receptor location R2, up to 62.0 dBA at sensitive receptor location R3, and up to 78.0 dBA at the sensitive receptor location R4,

largely based on conservative noise levels from the emergency generator and Project-related peak hour traffic noise levels. Overall, relative to the existing noise environment, the Project would be estimated to increase the ambient noise level by approximately 15.2 dBA at the residences to the west (R1) along Argyle Avenue, approximately 2.4 dBA to the hotel and residential uses to the north (R2) along Yucca Street, approximately 3.0 dBA to the residential uses to the east (R4) along Vista Del Mar, and by approximately 22.0 dBA at the residences to the south along Carlos Avenue (R4). The increase in unmitigated noise level at R2 and R3 not exceed the significance threshold of an increase of 5 dBA but would be above the applicable increase of 5 dBA at R1 and R4. This analysis conservatively assumes that the Project's operational noise sources would generate maximum noise levels simultaneously. **As such, the unmitigated composite noise level impact on sensitive receptors due to the Project's future operations would be potentially significant and mitigation measures would be required.**

**TABLE IV.I-12**  
**UNMITIGATED COMPOSITE NOISE LEVELS AT SENSITIVE RECEPTOR LOCATIONS R1, R2, R3,**  
**AND R4 FROM PROJECT OPERATION**

Operational Noise Sources	Noise Levels, dBA			
	Location R1	Location R2	Location R3	Location R4
<b>(A) Existing (Ambient) Noise Level</b>	<b>65</b>	<b>61</b>	<b>58</b>	<b>56</b>
<b>Project Composite Noise Sources</b>				
(1) Mechanical Equipment	55	51	48	46
(2) Outdoor/Open Space Activity	47	50 <sup>c</sup>	44 <sup>d</sup>	48
(3) Loading Dock and Refuse Collection Areas	26	N/A <sup>e</sup>	46	20
(4) Parking Structures	43	45	53	36
(5) Emergency Generator	80	46	40	78
(6) Off-site traffic <sup>a</sup>				
Estimated Project-only traffic noise level (peak Leq)	53.6	57.9	57.9	53.6
<b>(B) Project Composite Noise Level (1+2+3+4+5+6) <sup>b</sup></b>	<b>80.0</b>	<b>59.6</b>	<b>59.8</b>	<b>78.0</b>
<b>(C) Existing Plus Project Composite Noise Level (A+B) <sup>b</sup></b>	<b>80.2</b>	<b>63.4</b>	<b>62.0</b>	<b>78.0</b>
Project Increment (C-A)	15.2	2.4	3.0	22.0
Exceeds Threshold?	Yes	No	No	Yes

<sup>a</sup> Traffic volumes and associated noise levels conservatively assumed to be the same for R4 as R1.

<sup>b</sup> Noise levels are added logarithmically.

<sup>c</sup> Noise levels are added logarithmically for the Building 1 Level 4 podium courtyard (50 dBA) and the Building 1 Level 20 pool/roof garden (35 dBA).

<sup>d</sup> Noise levels are added logarithmically for the Building 1 Level 4 pool deck (37 dBA) and the Building 2 Level 4 roof garden (43 dBA).

<sup>e</sup> The Project would not have loading docks near location R2 and as such would not contribute to noise increases from loading docks at location R2.

SOURCE: ESA, 2019.

## **Conclusion**

Overall, the Project could generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies and mitigation measures would be required. As discussed below in subsection g, impacts from on-site construction noise would remain significant and unavoidable, even with implementation of the identified mitigation measures (see **MM-NOI-1** and **MM-NOI-2**). As discussed below in subsection g, operational noise would be less than significant with the incorporation of the identified mitigation measures (see **MM-NOI-4**).

### ***Threshold (b): Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

#### **(1) Structural Impacts**

##### **(a) Construction**

Construction activities can generate varying degrees of groundborne vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates groundborne 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 varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest groundborne vibration levels, to low rumbling sounds and perceptible groundborne vibration at moderate levels, to slight damage at the highest levels. Groundborne vibration from construction activities rarely reaches levels that damage structures. The PPV and VdB for the construction equipment anticipated to be used during Project construction are listed in **Table IV.I-13, Typical Groundborne Vibration Velocities for Potential Project Construction Equipment**.

Construction of the Project would generate groundborne vibration during site clearing, grading and shoring activities. Based on the groundborne vibration data provided in Table IV.I-13, groundborne vibration velocities created by operation of construction equipment would range from approximately 0.003 to 0.089 inches per second PPV at 25 feet from the source of activity.

**TABLE IV.I-13**  
**TYPICAL GROUNDBORNE VIBRATION VELOCITIES FOR THE PROJECT**  
**CONSTRUCTION EQUIPMENT**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Hoe Ram	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

Metro's Red Line subway tunnels are located underground approximately 500 feet south of the Project Site. Given the distance of 500 feet, intervening existing structures between the Metro's Red Line subway tunnels, and the underground locations of the tunnels, groundborne vibration generated by construction and operation of the Project would not have significant impacts on Metro's Red Line subway tunnels and operation. Therefore, impacts would be less than significant and no mitigation measures are required for Metro's Red Line tunnels.

The nearest single-family residential building along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) is located within approximately five feet from the Project Site. Construction activities immediately adjacent to the property line could produce groundborne vibration velocities of up to approximately 0.995 inches per second at this off-site residential building when heavy construction equipment operates within approximately five feet from the residential building. This value would exceed the 0.2 inch per second PPV significance threshold for potential residential building damage. **As such, the Project's impact related to groundborne vibration during construction is considered to be potentially significant. Mitigation is required and identified below.**

*(b) Operation*

The Project's day-to-day operations would include 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 that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. According to American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), pumps or compressors would

generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot.<sup>90</sup> The Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on Project building rooftops and not be located in direct contact with the ground. As such, it would not generate groundborne vibration off the Project Site. Therefore, groundborne vibration from the operation of such mechanical equipment would not impact any of the off-site sensitive receptors.

During Project operations, delivery trucks would visit the site similar to other residential developments. According to the FTA, delivery trucks rarely generate vibration that exceeds 70 VdB,<sup>91</sup> which is equivalent to approximately 0.013 in/sec PPV, which would be less than the significance threshold of 0.2 inch per second PPV for potential residential building damage.

**As such, groundborne vibration impacts associated with operation of the Project would be less than significant and mitigation is not required.**

## (2) Human Annoyance

### (a) Construction

The Thresholds Guide identifies residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks as sensitive uses. Off-site non-residential uses such as retail and commercial uses are not considered groundborne vibration sensitive receptors for human annoyance under CEQA. The only uses in the Project vicinity that are sensitive uses are residential uses. The nearest existing off-site residential structure is located along Vista Del Mar Avenue approximately within five feet south of the construction site, with other residential structures situated at greater distances along Vista Del Mar Avenue. These structures could be exposed to groundborne vibration from construction activities that would range from approximately from 62 to 91 VdB during construction, when construction activities occur near the property line. These values exceed the 72 VdB perception threshold. As shown in Table IV.I-13, construction groundborne vibration levels at 75 feet would exceed 72 VdB. At 100 feet, construction vibration levels would fall to below 72 VdB. Thus, sensitive receptor locations R1 at 80 feet from the Project Site and R2 at 65 feet from the Project Site would potentially be exposed to construction groundborne vibration levels in excess of 72 VdB.

Smaller equipment operating along the property line would result in groundborne vibration levels below the 72 VdB threshold. The groundborne vibration levels would exceed the significance threshold only when heavy equipment, such as a larger dozer and heavy trucks, operate along the boundary of the construction site. Construction-related groundborne vibration levels would exceed 72 VdB threshold intermittently and for generally very short durations. **Due to this potential exceedance, impacts related to**

<sup>90</sup> America Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc., Heating, Ventilating, and Air-Conditioning Applications, 1999.

<sup>91</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 113, 2018.

**construction-related groundborne vibration are considered potentially significant. Mitigation is required and identified below.**

As stated above, groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to vibration of floors and walls and is perceptible only inside buildings.<sup>92</sup> For typical buildings, groundborne vibration results in groundborne noise levels approximately 35 to 37 decibels lower than the velocity level.<sup>93</sup> According the FTA *Transit Noise and Vibration Impact Assessment Manual*, most of the studies of groundborne vibration in this country have focused on urban rail transit and the problems with groundborne vibration and noise that are common when there is less than 50 feet between a subway structure and building foundations. Project construction would not create on-going and continuous groundborne vibration and noise like that of an urban rail transit system. Rather, Project construction would generate intermittent or periodic groundborne vibration and noise, which means groundborne vibration and noise impacts would be less than that of an urban rail transit system. Nonetheless, as discussed above, unmitigated construction activities could exceed the groundborne vibration significance threshold and result in a significant groundborne vibration impact. **Since groundborne noise is a direct result of groundborne vibration levels, and since the nearest groundborne vibration-sensitive receptor is located closer than 50 feet of the Project Site, Project construction activities could also have a potentially significant groundborne noise impact on groundborne vibration-sensitive receptors. Mitigation is required and identified below.**

*(b) Operation*

The Project's day-to-day operations would include 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 that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause vibration impacts to the off-site environment. As discussed above, the Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on Project building rooftops and not be located in direct contact with the ground. As such, it would not generate groundborne vibration off the Project Site. Therefore, groundborne vibration from the operation of such mechanical equipment would not impact any of the off-site sensitive receptors.

During Project operations, delivery trucks would visit the site similar to other residential developments. According to the FTA, delivery trucks rarely generate vibration that

<sup>92</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, page 117, 2018.

<sup>93</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 6-3, page 126, 2018.

exceeds 70 VdB,<sup>94</sup> which would be less than the significance threshold of 72 VdB for human annoyance.

**As such, groundborne vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.**

As discussed above, operation of the Project would result in groundborne vibration levels substantially less than the significance threshold for groundborne vibration at groundborne vibration-sensitive receptors. For typical buildings, groundborne vibration results in groundborne noise levels approximately 35 to 37 decibels lower than the velocity level.<sup>95</sup> **Given that the groundborne vibration level would be much lower than the perceptibility threshold at groundborne vibration-sensitive uses, and given that groundborne noise would be approximately 35 to 37 decibels lower than the velocity level, operational groundborne noise impacts would also be less than significant at groundborne vibration-sensitive uses.**

***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?***

As discussed in Chapter VI (subsection Impacts Found not to be Significant) of this Draft EIR and in the Initial Study (Appendix A of this Draft EIR), the Project Site 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. No further analysis is required.

## **e) Cumulative Impacts**

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise from on-site stationary sources is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. As such, only related projects located in the immediate Project Site area could potentially contribute to cumulative on-site stationary source noise impacts. However, cumulative offsite mobile source noise impacts could potentially be created by traffic from all related projects throughout a larger area.

As discussed in Chapter III, *General Description of Environmental Setting*, in this Draft EIR, the City has identified 137 related projects for the Project. Of the related projects listed in Table III-1 and shown on Figure III-1 in this Draft EIR, and discussed in Chapter

<sup>94</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 113, 2018.

<sup>95</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3, page 126, 2018.



III, five projects are located in close enough proximity to the Project Site to potentially create cumulative on-site stationary source impacts. Specifically, these five projects are: the Argyle House (formerly Yucca Street Condos) (No. 5), approximately 80 feet from the Project Site across Argyle Avenue; the Pantages Theater Office (No. 14), an office construction project at 6225 W. Hollywood Boulevard, approximately 450 feet from the Project Site; Kimpton Everly Hotel (formerly Argyle Hotel Project) (No. 16), a hotel project at 1800 N. Argyle Avenue, approximately 60 feet from the Project Site; the Hollywood Center (formerly Millennium Hollywood) Mixed-Use Project with hotel, residential, office, retail, fitness uses (No. 29), approximately 400 feet from the site at 1740 N. Vine Street; and the citizenM Hotel (No. 69), approximately 350 feet from the Project Site at 1718 Vine Street. However, the construction of the Argyle House (No. 5), Kimpton Everly Hotel Project (No. 16), and citizenM Hotel (No. 69) have been completed. These three projects are therefore included as part of the existing ambient noise environment and are not considered as contributors to cumulative construction impacts.

## (1) Construction Noise

### (a) *On-site Construction Noise*

Noise from on-site construction activities is localized and would normally affect the areas within 500 feet from each individual construction site. As stated above, two of the Project's 137 related projects are located within the immediate vicinity of the Project Site and have the potential to cumulatively contribute to ambient noise level increases due to construction activities associated with each project site.

Residential uses (represented by measurement location/sensitive receptor location R4) to the south of the Project Site along Carlos Avenue are situated approximately 190 feet away from the Project Site. The nearest related projects which may be under construction concurrently with the Project that have the highest potential for cumulative impacts to R4 are Related Project 14 (Pantages Theater Office), located to the south of the Project Site, and Related Project 29 (Hollywood Center), located to the west of the Project Site. Construction of these related projects could overlap with construction of the Project. The Project alone would result in a maximum construction noise level of 69 dBA  $L_{eq}$  at the off-site receptor locations along Carlos Avenue (R4) during demolition, grading/excavation, and building construction/paving/architectural coating. Therefore, short-term cumulative impacts could occur at the R4 noise sensitive receptors.

Even if the mitigation measures identified for the Project were also imposed on these related projects, and if nearby related projects were to be constructed concurrently with the Project, significant and unavoidable cumulative construction noise impacts could result at the R4 receptors. Those noise levels would be intermittent, temporary and would cease at the end of the construction phase, and their construction days and hours would comply with time restrictions and other relevant provisions in the LAMC. Noise associated with cumulative construction activities would also be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual project and compliance with the City's noise ordinances. Even so, potential cumulative impacts

as a result of construction of the Project and nearby related projects cannot be precluded. **Therefore, cumulative construction noise impacts from on-site activities would be significant and unavoidable.**

*(b) Off-Site Construction Traffic Noise*

Construction traffic from any of the related projects that are under construction when the Project is also under construction could contribute to noise levels on major thoroughfares throughout the area, even though those related projects would be located in different areas and, at least to some extent would have varied haul routes and traffic patterns associated with their construction. However, there is potential for overlap in haul routes along Argyle Avenue and Yucca Street. Existing ambient daytime noise levels at R1 (Argyle Avenue) and R2 (Yucca Street) were 65 dBA and 61 dBA, respectively (see table IV.I-5). It is estimated that up to 160 truck trips per hour could occur along Argyle Avenue and up to 64 truck trips per hour could occur along Yucca Street without exceeding the significance criteria of 5 dBA above ambient noise levels (70 dBA and 66 dBA). The Project would generate up to 26 truck trips per hour during the grading/excavation phase of construction, which would last for approximately four months. Other phases of Project construction would generate fewer maximum daily truck trips. If the related projects generated 134 more trips per hour along Argyle Avenue and 38 more trips per hour along Yucca Street, the cumulative noise levels from off-site construction would exceed the significance threshold. During peak periods it is possible that the Project and related projects would have overlapping haul truck schedules and could cause noise levels greater than the significance thresholds. **Therefore, it is conservatively concluded that the off-site construction noise impacts would be cumulatively considerable and cumulative off-site construction noise impacts would be significant and unavoidable.**

**(2) Operation**

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project Site area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. The noise levels associated with existing base traffic volumes without the Project, and cumulative base traffic volumes with the Project are provided in Table IV.I-11, above. Table IV.I-11 also shows the Project's contribution to the cumulative noise levels. The maximum cumulative noise increase from the Project plus related project traffic would be 3.0 dBA CNEL, which would occur along Yucca Street, between Argyle Avenue and Gower Street. This increase in sound level would not exceed the applicable significance threshold of an increase of 5.0 dBA CNEL. As a result, cumulative traffic related noise impacts would be less than significant.

As discussed above, the Project's composite stationary source noise impacts would be potentially significant due to the emergency generator. However, with implementation of

Mitigation Measure MM-NOI-5, discussed below, the Project's composite stationary source noise impacts would be less than significant. As is true for the Project, the LAMC-required provisions that limit stationary-source noise from items such as roof-top 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 the related projects would be sufficiently low that it would not result in an additive increase to Project-related noise levels with implementation of mitigation measures identified by each related project. Further, noise from other stationary sources, including parking structures, open space activity, emergency generator, and loading docks and composite noise levels from each stationary sources would be limited to areas in the immediate vicinity of each related project with implementation of mitigation measures identified by each related project. Although a 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 operational noise conditions at or near the Project Site with implementation of mitigation measures identified by each related project. As the Project's composite stationary-source impacts would not be significant, and the Project's contribution to cumulative traffic impacts would not be cumulatively considerable, the Project's contribution to cumulative stationary-source noise impacts attributable to cumulative development would not be cumulatively considerable and impacts would not be significant.

### (3) Groundborne Vibration and Noise

Due to the rapid attenuation characteristics of groundborne vibration and noise and the distances between the related projects and the Project Site, there is no potential for cumulative construction- or operational-period impacts to be created with respect to groundborne vibration or noise. Therefore, cumulative impacts would be less than significant.

## f) Mitigation Measures

### (1) Construction Noise and Groundborne Vibration and Noise

As discussed above, Project construction has the potential to result in significant noise and groundborne vibration and noise impacts at three sensitive receptor locations: R1, R2, R3, and R4. Thus, the following mitigation measures are identified to minimize these construction-related impacts:

**MM-NOI-1: Construction Noise Barriers:** The Project shall provide a temporary 15-foot tall construction noise barriers (i.e., wood, sound blanket) between the Project construction site and residential development along the entire south, west, and east boundaries of the Project Site, achieving a performance standard of a 15 dBA noise level reduction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure. The temporary noise barriers shall be used during early Project

construction phases (up to the start of framing) when the use of heavy equipment is prevalent.

**MM-NOI-2: Equipment Noise Control:** The Project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment.

- The contractor(s) shall not use blasting, jack hammers or pile drivers. The contractor(s) shall use only electric power crane(s), and shall use other electric equipment if commercially available.
- The contractor(s) shall limit unnecessary idling of equipment on or near the site.
- The contractor(s) shall place noisy construction equipment as far from the Project Site edges as practicable.
- The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. For example, absorptive mufflers are generally considered commercially available, state-of-the-art noise reduction for heavy duty equipment.<sup>96</sup> The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

**MM-NOI-3:** Heavy construction equipment such as a large dozer, a large grader, and a large excavator shall not operate within 15 feet from the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue (R3). Small construction equipment such as a small dozer, a small excavator, and a small grader shall be permitted to operate within 15 feet from the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue (R3). The Applicant shall designate a construction relations officer to serve as a liaison with the nearest single-family residential buildings (R3). The liaison shall be responsible for responding to concerns regarding construction groundborne vibration within 24 hours of receiving a complaint. The liaison shall ensure that steps will be taken to reduce construction groundborne vibration levels as deemed appropriate and safe by the on-site construction manager. Such steps could include the use of vibration absorbing barriers, substituting lower groundborne vibration generating equipment or activity, rescheduling of high groundborne vibration-generating construction activity, or other potential adjustments to the construction program to reduce groundborne vibration levels at the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue (R3).

<sup>96</sup> United muffler Corp: <https://www.unitedmuffler.com/> P) 866-229-3402; Auto-jet Muffler Corp: <http://mandrelbending-tubefabrication.com/index.php>, P)800-247-5391; AP Exhaust Technologies: <http://www.apexhaust.com/>, P)800-277-2787

**MM-NOI-4:** Prior to start of construction, the Project Applicant shall retain the services of a licensed building inspector, or structural engineer, or other qualified professional as approved by the City, to inspect and document (video and/or photographic) the apparent physical condition of the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3), including but not limited to the building structure, interior wall, and ceiling finishes.

The Project Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a groundborne vibration monitoring program capable of documenting the construction-related groundborne vibration levels at each residence during demolition, excavation, and construction of the parking garages. The groundborne vibration monitoring program shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. Groundborne vibration data shall be stored on a two-second interval. The program shall also be programmed for two preset velocity levels: a warning level of 0.15 inch/second PPV and a regulatory level of 0.2 inch/second PPV. The program shall also provide real-time alerts when the groundborne vibration levels exceed the two preset levels.

- The groundborne vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities for approval.
- In the event the warning level (0.15 inch/second PPV) is triggered, the contractor shall identify the source of groundborne vibration generation and provide feasible steps to reduce the groundborne vibration level such as halting/staggering concurrent activities or utilizing lower vibratory techniques.
- In the event the regulatory level (0.2 inch/second PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the affected residences and visually inspect the affected residences for any damage. Results of the inspection must be logged. The contractor shall identify the source of groundborne vibration generation and implement feasible steps to reduce the groundborne vibration level such as staggering concurrent activities or utilizing lower vibratory techniques. Construction activities may continue upon implementation of feasible steps to reduce the groundborne vibration level.
- In the event damage occurs to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction groundborne vibration, such materials shall be repaired to the same or better physical condition as documented in the pre-construction inspection and video and/or photographic records.

## (2) Operational Noise

As discussed above, the Project has the potential to result in significant impacts associated with operational noise. Therefore, the following mitigation measure is identified to minimize operational-related noise impacts:

**MM-NOI-5: Emergency Generator:** The Project shall install a sound enclosure and/or equivalent noise-attenuating features (i.e., mufflers) for the emergency generator that will provide approximately 25 dBA noise reduction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

## g) Level of Significance After Mitigation

### (1) Construction Noise and Groundborne Vibration and Noise

MM-NOI-1 provides for sound barriers that would achieve a noise reduction of 15 dBA between Project construction and off-site receptor locations along Argyle Avenue (R1), Vista Del Mar Avenue (R3), and Carlos Avenue (R4). Sound barriers would not be feasible to reduce the impacts to sensitive receptors (represented by measurement location/sensitive receptor location R2) along the north of Yucca Street since the Project's construction staging area and/or traffic entrance would be located on the south side of Yucca Street adjacent to the Project Site. Although the noise reduction provided by the noise barriers would be considered a substantial reduction, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at the residential uses along Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3) during some phases of construction. In addition, the sound barrier would not reduce the noise levels at the upper floors (i.e., 3<sup>rd</sup> to 18<sup>th</sup> floor) of the multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue (R1) or the upper floors (i.e. 3<sup>rd</sup> floor to 5<sup>th</sup> floor) of the five-story mixed-use residential uses (R4) along Carlos Avenue since the proposed sound barrier would not block the line of sight between the construction site and upper floors of the 18-story multi-family residential use (R1) or the five-story mixed-use residential uses (R4). **Thus, construction noise impacts would be significant and unavoidable at the upper floors (i.e., 3<sup>rd</sup> to 18<sup>th</sup> floor) of the multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue (R1), at the adjacent residential uses along Vista Del Mar Avenue (R3), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (R4), and those on the north side of Yucca Street (R2), even after implementation of MM-NOI-1.**

MM-NOI-2 requires Project contractors to employ state-of-the-art noise minimization strategies, as feasible, when using mechanized construction equipment. **While noise minimization strategies will reduce noise where feasible, construction noise impacts would remain significant and unavoidable, even with implementation of MM-NOI-1 and MM-NOI-2 together.**

Implementation of MM-NOI-3 would ensure that construction groundborne vibration levels would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue (R3). This mitigation measure requires a 15-foot buffer between the nearest residential building and heavy construction equipment operations. At 15 feet, the groundborne vibration levels would be reduced to 0.191 inches per second (PPV). The mitigated level of 0.191 inches per second (PPV) is less than, but still close to the significance threshold of 0.2 inches per second (PPV). Therefore, MM-NOI-4 is also recommended to mitigate potential groundborne vibration impacts. Implementation of MM-NOI-4 would ensure that groundborne vibration levels are below the thresholds associated with potential damage to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction. However, because MM-NOI-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.

In addition, temporary construction-related groundborne vibration and groundborne noise impacts on human annoyance would be reduced at the adjacent residential uses along the west side Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3). However, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. **Therefore, temporary construction-related groundborne vibration structural and groundborne vibration and noise human annoyance impacts would be significant and unavoidable.**

## (2) Operational Noise

### (a) Building 1

Generator. With the implementation of MM-NOI-5, the Project will install a sound enclosure and/or equivalent noise attenuation features (i.e., mufflers) for the emergency generator that provide approximately 25 dBA of noise reduction. With a sound enclosure, the generator noise level will be reduced from 80 dBA to approximately 55 dBA at the noise sensitive receptors (measurement location/sensitive receptor location R1) along Argyle Avenue and from 78 dBA to approximately 53 dBA at the noise sensitive receptors (measurement location/sensitive receptor location R4) south of the Project Site, which are below the significance thresholds of 70 dBA for noise-sensitive receptors R1 and 61 dBA for noise-sensitive receptor R4. The combined mitigated noise level from the emergency generator plus the existing ambient noise levels (65 dBA at R1 and 56 dBA at R4) would be approximately 65 dBA at R1 and 58 dBA at R4, which would not exceed the significance threshold. **Therefore, generator-related noise impacts would be less than significant with mitigation.**

## (b) Composite Noise Levels

As shown in **Table IV.I-14, Mitigated Composite Noise Levels at Sensitive Receptor Location R1 and R4 from Project Operation with Mitigation**, the pool deck-related podium courtyard activities on Level 4 (Building 1) would contribute a maximum of 47 dBA at sensitive receptor R1, and the pool deck activities on Level 4 (Building 1) would contribute a maximum of 48 dBA at sensitive receptor R4. Mechanical equipment would contribute a maximum of 55 dBA to R1 and a maximum of 46 dBA to R4.

**TABLE IV.I-14**  
**COMPOSITE NOISE LEVELS AT SENSITIVE RECEPTOR LOCATION R1 AND R4**  
**FROM PROJECT OPERATION WITH MITIGATION**

Operational Noise Sources	Noise Levels, dBA	Noise Levels, dBA
	Location R1	Location R4
<b>(A) Existing (Ambient) Noise Level</b>	<b>65</b>	<b>56</b>
<b>Project Composite Noise Sources</b>		
(1) Mechanical Equipment	55	46
(2) Podium Courtyard and Pool Deck on Level 4 (Building 1)	47	48
(3) Loading Dock and Refuse Collection Areas	26	20
(4) Parking Structures	43	36
(5) Emergency Generator	55	53
(6) Off-site traffic <sup>a</sup>		
Estimated Project-only traffic noise level	53.6	53.6
<b>(B) Project Composite Noise Level (1+2+3+4+5+6) <sup>a</sup></b>	<b>59.7</b>	<b>57.3</b>
<b>(C) Existing Plus Project Composite Noise Level (A+B)</b>	<b>66.1</b>	<b>59.7</b>
Project Increment (C-A)	1.1	3.7
Exceeds Threshold?	No	No

<sup>a</sup> Traffic volumes and associated noise levels conservatively assumed to be the same for R4 as R1.

<sup>b</sup> Noise levels are added logarithmically.

<sup>c</sup> With the implementation of MM-NOISE-4, emergency generator noise levels of up to 80 dBA at R1 and 78 dBA at R4 would be reduced to 55 dBA and 53 dBA, respectively.

SOURCE: ESA, 2019.

MM-NOISE-5 would reduce emergency generator-related noise levels to 55 dBA at the noise sensitive receptors (measurement location/sensitive receptor location R1) along Argyle Avenue and 53 dBA at the noise sensitive receptors (measurement location/sensitive receptor location R4) south of the Project Site, which are below the significance thresholds of 70 dBA for noise-sensitive receptors R1 and 61 dBA for noise-sensitive receptor R4. The mitigated composite noise levels from Project operation with the mitigated emergency generator noise levels would be up to 66.1 dBA for R1 and 59.7 dBA for R4. Overall, relative to the existing noise environment, the Project would be estimated



to increase the ambient noise level by approximately 1.1 dBA at the residences to the west (represented by measurement location/sensitive receptor location R1) along Argyle Avenue and by 3.7 dBA at the residences to the south (represented by measurement location/sensitive receptor location R4). This increase in noise would be below the applicable thresholds involving increases of 5 dBA. This analysis conservatively assumes that the Project's operational noise sources would generate maximum noise levels simultaneously. **As such, the composite noise level impacts on sensitive receptors due to the Project's future operations would be less than significant with mitigation.**

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## **IV. Environmental Impact Analysis**

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### **J. Population and Housing**

#### **1. Introduction**

This section analyzes the Project's contribution to population, housing, and employment growth within the City of Los Angeles. Project effects on these demographic characteristics are compared to adopted and advisory growth forecasts and relevant policies and programs regarding planning for future development. Supporting documentation is provided in Appendix I, Population, Housing, and Employment Data, of this Draft Environmental Impact Report (EIR). Related information regarding the effects of the new development on the relationship between land uses and resulting land use patterns is further addressed in Section IV.H, *Land Use*. 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 (SCAG)**

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 Metropolitan Planning Organization (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 Regional Transportation Plan (RTP) 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.

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies in determining future service demands. Projections in the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 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 provisions of local jurisdictions (e.g., zoning changes). Through these updates, public agencies have advance information regarding changes in growth that must be addressed in planning for their provision of services. Changes in the growth rates are reflected in the new projections for service and utilities planning through the long-term time horizon.

In addition, SCAG establishes policies pertaining to regional growth and efficient development patterns to reduce development impacts on traffic congestion and related increases in air quality emissions. These policies are discussed in detail in Section IV.H, *Land Use and Planning*.

(i) *Regional Transportation Plan/Sustainable Communities Strategy*

On April 7, 2016, SCAG adopted its 2016 RTP/SCS, which is an update to the previous 2012 RTP/SCS.<sup>1</sup> Using growth forecasts and economic trends, the 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 RTP/SCS successfully achieves and exceeds the greenhouse gas (GHG) emission-reduction targets set by the California Air Resources Board (CARB) by demonstrating 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.<sup>2</sup> Compliance with and implementation of 2016 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 RTP/SCS provides specific strategies for successful implementation. These strategies 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; 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.

<sup>1</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed November 2017.

<sup>2</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy page 8.

The 2016 RTP/SCS includes new strategies to promote active transportation, supports 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 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 RTP/SCS.

The 2016 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 at the regional, county, and local jurisdictional levels, and transportation analysis zones (TAZs) that provide small area data for transportation modeling.<sup>3</sup>

The 2016 RTP/SCS identifies the amount of expected growth in the region and provides the expected distribution of that growth. The distribution reflects goals cited in the 2016 RTP/SCS:

- Aligning the plan investments and policies with improving regional economic development and competitiveness;
- Maximizing mobility and accessibility;
- Ensuring travel safety and reliability for all people and goods in the region;
- Preserving and ensuring a sustainable regional transportation system;
- Maximizing productivity of the transportation system;
- Protecting the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking);
- Actively encouraging and creating incentives for energy efficiency, where possible;
- Encouraging land use and growth patterns that facilitate transit and non-motorized transportation; and
- Maximizing the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.<sup>4</sup>

<sup>3</sup> SCAG, 2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix. [http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf), accessed November 2017.

<sup>4</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 64.

The 2016 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."<sup>5</sup> 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.<sup>6</sup> Smart land use strategies encourage walking, biking, and transit use, thereby reducing vehicular demand, saving travel time, reducing pollution, and ultimately improving health.<sup>7</sup>

A component of the SCAG strategy has been to focus new growth in High-Quality Transit Areas (HQTAs).<sup>8</sup> 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.<sup>9</sup> While HQTAs account for only 3 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, between 2012 and 2040.<sup>10</sup> Exhibit 5.1 of the 2016 RTP/SCS depicts the HQTAs in the SCAG region.<sup>11</sup>

#### (ii) *Regional Housing Needs Assessment*

SCAG prepares the RHNA mandated by State law as part of the periodic updating of the Housing Elements of General Plans by local jurisdictions. 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, an 86-member governing board representing six counties and 191 cities within the SCAG jurisdiction, on October 4, 2012.<sup>12</sup> 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.

<sup>5</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, Figure 5.1, System Management Pyramid, page 85.

<sup>6</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 75.

<sup>7</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 16.

<sup>8</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 20.

<sup>9</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 20.

<sup>10</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 75.

<sup>11</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 77.

<sup>12</sup> Southern California Association of Governments, Regional Council, <http://www.scag.ca.gov/programs/Pages/5th-Cycle-RHNA.aspx>. Accessed August 2019.

## (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 community'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 community, 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 the Hollywood Community Plan, which guides land use at the community level for the area surrounding the Project Site.

### (b) *City of Los Angeles General Plan Framework*

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan.<sup>13</sup> 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, 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 Land Use Chapter 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. As shown in Figure IV.H-1, *General Plan Land Use Designations*, in Section IV.H, *Land Use*, of this Draft EIR, the West and Center parcels of the Project Site are designated Regional Center Commercial under the General Plan Framework and as such, are designated as high-density places, and a focal point of regional commerce, identity, and activity.<sup>14</sup> The development of sites and mixed residential/commercial uses is encouraged in Regional Centers, in concert with supporting services, open space, and amenities.<sup>15</sup> The density of Regional Centers also supports the development of a comprehensive and interconnected network of public transit and services.<sup>16</sup> The three (3) East Parcels along Vista Del Mar Avenue are designated as Multiple Family Medium Residential and fall outside of the Regional Center designation.

<sup>13</sup> City of Los Angeles, General Plan Framework Element, <http://cityplanning.lacity.org/cwd/framwk/fwhome0.htm>. Accessed November 2017.

<sup>14</sup> City of Los Angeles General Plan Framework Element, Long-Range Land Use Diagram, Metro Area, 2003, <https://planning.lacity.org/odocument/e86ecf5f-fb4c-4adb-93f7-d9aae8830744/F31MtoMp.pdf>. Accessed November 2017.

<sup>15</sup> City of Los Angeles, General Plan Framework, Chapter 3 Land Use, Regional Centers, <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm>. Accessed November 2017.

<sup>16</sup> City of Los Angeles, General Plan Framework, Chapter 3 Land Use, Regional Centers, <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm>. Accessed November 2017.

The General Plan Framework Housing chapter states that housing production has not kept pace with the demand for housing.<sup>17</sup> According to the General Plan Framework, Los Angeles has insufficient vacant properties to accommodate the projected population growth and the supply of land zoned for residential development is constrained.<sup>18</sup> The Housing Chapter states that new residential development will require the recycling and/or intensification of existing developed properties.<sup>19</sup> 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.<sup>20</sup> In particular, Policy 4.1.1 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.”<sup>21</sup>

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.<sup>22</sup> Policy 7.2.3 encourages new commercial development in proximity to rail and bus transit corridors.<sup>23</sup>

### (c) *General Plan Housing Element*

The Housing Element of the General Plan, prepared pursuant to State law, provides planning guidance in meeting the housing needs identified in SCAG’s RHNA. The Housing Element identifies Los Angeles’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 to implement to create sustainable, mixed-income neighborhoods. The 2013–2021 Housing Element, an update

<sup>17</sup> City of Los Angeles, General Plan Framework, Chapter 4 Housing, Summary of Housing Issues, <http://cityplanning.lacity.org/cwd/framwk/chapters/04/04.htm>. Accessed November 2017.

<sup>18</sup> City of Los Angeles, General Plan Framework, Chapter 4 Housing, Summary of Housing Issues, <http://cityplanning.lacity.org/cwd/framwk/chapters/04/04.htm>. Accessed November 2017.

<sup>19</sup> City of Los Angeles, General Plan Framework, Chapter 4 Housing, Summary of Housing Issues, <http://cityplanning.lacity.org/cwd/framwk/chapters/04/04.htm>. Accessed November 2017.

<sup>20</sup> City of Los Angeles, General Plan Framework, Chapter 4 Housing, Housing Goals.

<sup>21</sup> City of Los Angeles, General Plan Framework, Chapter 4 Housing, Goals, Objectives, and Policies, Objective 4.2.

<sup>22</sup> City of Los Angeles, General Plan Framework, Chapter 7 Economic Development, Goals, Objectives, and Policies, Policy 7.2.2, <http://cityplanning.lacity.org/cwd/framwk/chapters/07/07.htm>. Accessed November 2017.

<sup>23</sup> City of Los Angeles, General Plan Framework, Chapter 7 Economic Development, Goals, Objectives, and Policies, Policy 7.2.3.



to the previous 2006–2014 Housing Element that is based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013.<sup>24</sup> Policies of note include Policy 1.1.3, which 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.”<sup>25</sup> In addition, Policy 1.1.4 states that the City should “[e]xpand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.”<sup>26</sup> The Housing Element carries forward the goals of the Framework Element Housing chapter to encourage infill development and increase density in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit.<sup>27</sup>

Further, Chapter 1, Housing Needs Assessment, identifies Los Angeles’s share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los Angeles Regional Housing Needs Assessment Allocation for the period of 2014–2021, indicates that Los Angeles’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.<sup>28</sup> The remaining 56.8 percent of the needed housing units consisting 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 current allocation represents one-fifth of the total need of 412,721 housing units identified for the six-county SCAG region. The 56.8 percent (approximately one-fifth of the total need) of needed housing units consisting of moderate-, low-, very low-, and extremely low-income units increased from the previous housing needs cycle and Los Angeles’ proportion, which accounted for one-sixth of the regional need for the same types of units. This shift in the proportion of the regional needs allocated to Los Angeles represents compliance with the SCS, which encourages placing new development in areas with high proportions of HQTAs.<sup>29</sup>

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 construction of housing units is 59,559 units, of which 46,500 units would be for above moderate-income units, 1,122 units would be for moderate-income families, 4,873

<sup>24</sup> City of Los Angeles Department of City Planning, Housing Element 2013-2021, December 3, 2013. Available at: [https://planning.lacity.org/odocument/883be4c9-392f-46e5-996b-b734274da37d/Housing\\_Element\\_2013\\_-\\_2021\\_.pdf](https://planning.lacity.org/odocument/883be4c9-392f-46e5-996b-b734274da37d/Housing_Element_2013_-_2021_.pdf). Accessed June 14, 2017.

<sup>25</sup> City of Los Angeles Department of City Planning, Housing Element 2013-2021, December 3, 2013, page 6-6.

<sup>26</sup> City of Los Angeles Department of City Planning, Housing Element 2013-2021, December 3, 2013, page 6-6.

<sup>27</sup> City of Los Angeles Department of City Planning, Housing Element 2013-2021, December 3, 2013, page c-xvi.

<sup>28</sup> City of Los Angeles Department of City Planning, Housing Element 2013-2021, December 3, 2013, Table 1.29, page 1-79.

<sup>29</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 25.

new units would be for low-income, 3,834 would be for very low-income, and 1,730 would be for extremely low income.<sup>30</sup>

(d) *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.<sup>31</sup> The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems.<sup>32</sup> 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 in the communities and depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project Site is located within the Hollywood Community Plan area. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use.<sup>33</sup>

(i) *1988 Hollywood Community Plan*

The 1988 Hollywood Community Plan was prepared to address growth and the arrangement of land uses within its boundaries through the year 2010.<sup>34</sup> The Community Plan estimated that the plan area would reach a population of 219,000 for the time period ending in 2010, an increase of 38,000 people over the population of 181,000 per the 1980 census.<sup>35</sup> At the same time, the 1988 Hollywood Community Plan estimated that the land allocation and provisions of the plan could accommodate a population capacity of 231,395 people.<sup>36</sup> The Community Plan capacity is estimated to be 5.7 percent in excess of the projected 2010 population.<sup>37</sup>

<sup>30</sup> City of Los Angeles Department of City Planning, Housing Element 2013-2021, Table ES.1, page c-xxi.

<sup>31</sup> City of Los Angeles, General Plan Framework, Chapter 3 Land Use, Summary of Land Use Conditions and Characteristics.

<sup>32</sup> City of Los Angeles, General Plan Framework, Chapter 3 Land Use, Summary of Land Use Conditions and Characteristics.

<sup>33</sup> City of Los Angeles, General Plan Framework, Chapter 3 Land Use, Summary of Land Use Conditions and Characteristics.

<sup>34</sup> City of Los Angeles Department of City Planning, Hollywood Community Plan, page HO-2. Adopted December 13, 1988. Available at: <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed October 2017.

<sup>35</sup> City of Los Angeles Department of City Planning, Hollywood Community Plan, page HO-3.

<sup>36</sup> City of Los Angeles Department of City Planning, Hollywood Community Plan, page HO-3.

<sup>37</sup> City of Los Angeles Department of City Planning, Hollywood Community Plan, page HO-3.

The following objective of the Hollywood Community Plan is relevant to population, housing, and employment:<sup>38</sup>

**Objective 3a:** To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice

However, as the Community Plan does not provide growth projections beyond 2010, the projections in the Community Plan are considered to be out of date.<sup>39</sup> Because there are no effective updated projections incorporated into the effective Hollywood Community Plan, the Project analysis below will focus on projections provided by SCAG's 2016 RTP/SCS for the city of Los Angeles.

(e) *Rent Stabilization Ordinance and Ellis Act*

The City's Rent Stabilization Ordinance (RSO) was adopted in 1979 to place price controls on existing rental properties, while attempting to allow landlords a reasonable return on their investments.<sup>40</sup> The existing units on the Project Site are subject to the RSO because their certificates of occupancy were issued prior to the effective date specified in the RSO of 1978.

The Ellis Act<sup>41</sup> was adopted in 1986 and provides that a city cannot compel the owner on any residential real property to offer, or to continue to offer, accommodations for rent or lease. In other words, the Ellis Act ensures that landlords have the constitutional right to evict tenants and exit the rental housing business. If, however, rental accommodations are re-offered in an existing building or an existing building is demolished and new accommodations are constructed on the same property and offered for rent within five years, then the new accommodations would be subject to the RSO.<sup>42</sup>

The City's RSO, therefore, provides that if a landlord demolishes residential property subject to the City's RSO and builds new residential units on the same property within five years, the newly constructed units are also subject to the City's RSO.<sup>43</sup> If, however, the demolished rental units are replaced by an equal number of new affordable units, but these affordable units do not exceed 20 percent of the total number of newly constructed units, the owner may apply to the Los Angeles Housing Department to exempt the new units from the RSO.<sup>44</sup> In order to mitigate the effects on the tenants, the City's RSO

<sup>38</sup> City of Los Angeles Department of City Planning, Hollywood Community Plan, page HO-1.

<sup>39</sup> The City is currently working on an update to the Plan, and a Draft Environmental Impact Report was released in November 2018. The 1988 Hollywood Community Plan is in effect an operational in the City pursuant to City Ordinance No. 182,960, passed in 2014, following a judicial order that set aside the update to the Hollywood Community Plan adopted by the City in 2012.

<sup>40</sup> Los Angeles Housing and Community Investment Department, RSO Overview, <http://hcidla.lacity.org/RSO-Overview>, accessed November 2017.

<sup>41</sup> California Government Code Section 7060-7060.7.

<sup>42</sup> California Government Code Section 7060.2(d).

<sup>43</sup> LAMC Section 151.28 (A)

<sup>44</sup> LAMC Section 151.28 (B)

provides that when a landlord desires to demolish rental units subject to the RSO, or otherwise withdraw the units from rental housing use, the landlord must provide advance notice to the City and the tenants,<sup>45</sup> and pay the tenants specified relocation fees.<sup>46</sup>

(f) *Sustainable City pLAn*

The City of Los Angeles released its first-ever sustainability plan, the Sustainable City pLAn, on April 8, 2015.<sup>47</sup> The pLAn provides a roadmap for achieving short-term (by 2017) sustainability results and sets long-term (by 2025 and 2035) goals for achieving a cleaner environment and stronger economy. The pLAn sets forth a goal of transforming Los Angeles into an environmentally healthy, economically prosperous, and equitable City over the next 20 years.

Key visions for its long-term goals (by 2035) regarding the preferred development scenario in the Project Site vicinity include the following:<sup>48</sup>

- Housing and Development: We address LA's housing shortage, ensure that most new units are accessible to high-quality transit, and close the gap between incomes and rents.
- Urban Ecosystem: We all have access to parks and open space, including a revitalized LA River Watershed.
- Livable Neighborhoods: We all live in safe, vibrant, well-connected, and healthy neighborhoods.

The Housing & Development chapter of the Sustainable City pLAn includes the following goals:<sup>49</sup>

- Start constructing 17,000 new units of housing within 1,500 feet of transit by 2017.
- Provide 100,000 new housing units by 2021, leading to 150,000 new housing units by 2025.
- Reduce the number of rent-burdened households by at least 15 percentage points by 2035.

## **b) Existing Conditions**

### **(1) On-Site Conditions**

The Project Site is currently improved with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings and associated carports and paved surface parking areas, all of which would be demolished and removed for

<sup>45</sup> LAMC Section 151.23

<sup>46</sup> LAMC Section 151.09 (G)

<sup>47</sup> City of Los Angeles, Sustainable City pLAn, April 2015, <http://plan.lamayor.org/>. Accessed on October 14, 2016.

<sup>48</sup> City of Los Angeles, Sustainable City pLAn, April 2015, page 9.

<sup>49</sup> City of Los Angeles, Sustainable City pLAn, April 2015, page 48.

development of the Project. Overall, the Project Site currently contains 43 total multi-family units (duplex = 2 units; 1 studio apartment over duplex garage; apartment buildings = 40 units) and one single-family residence. Thus, there are a total of 44 residential units currently located on the Project Site. As the Project Site currently only has residential uses, the existing uses do not generate jobs.

## (2) Population, Housing, and Employment Estimates

As stated above, Project effects on population and housing are considered at the citywide level. Current and future projected population, housing and employment estimates for these geographies are based on data included in the SCAG 2016 RTP/SCS.<sup>50, 51</sup>

The SCAG 2016 RTP/SCS is based on growth projections for population, housing, and employment prepared for regional, county, and local jurisdictional areas and TAZs. The 2016 RTP/SCS reports demographic data for 2012 and 2040. The 2016 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. An estimate of the 2016 baseline population and growth projections for the projected Project buildout year of 2022 and the SCAG 2040 Horizon Year, are shown in **Table IV.J-1, 2016 RTP/SCS Projected Population, Housing, and Employment Estimates**, and discussed below.<sup>52</sup>

### (a) Population

As reported in Table IV.J-1, the City of Los Angeles' population is expected to grow by 163,693 people, or four percent, by the time of Project buildout in 2022 as compared to 2016.

By 2040, the City of Los Angeles' population is expected to grow by 654,771 people, or 17 percent, as compared to 2016.

### (a) Housing

As reported in Table IV.J-1, the number of households is expected to increase in the City of Los Angeles by 78,171 units, or six percent, by the time of Project buildout in 2022 as compared to 2016.

By 2040, the number of households in the City of Los Angeles is expected to grow by 312,685 units, or 23 percent, as compared to 2016.

<sup>50</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

<sup>51</sup> The SCAG estimates are used in this analysis as they incorporate population, households and employment statistics from a single data base with a common set of assumptions for calculating estimates. Further, SCAG estimates are components of and integral to the future projections that are used as the basis of the analysis below.

<sup>52</sup> The 2016 baseline estimate was determined by interpolating from data presented in the SCAG projections.

**TABLE IV.J-1**  
**2016 RTP/SCS PROJECTED POPULATION, HOUSING, AND EMPLOYMENT ESTIMATES**

	Projected Buildout Year - 2022				SCAG 2040 Horizon Year		
	2016 Baseline	Projected	Total Growth	Percentage Increase as Compared to 2016	Projected	Total Growth	Percentage Increase as Compared to 2016
Population	3,954,629	4,118,322	163,693	4%	4,609,400	654,771	17%
Housing	1,377,615	1,455,786	78,171	6%	1,690,300	312,685	23%
Employment	1,763,929	1,865,222	101,293	6%	2,169,100	405,171	23%

SOURCE: Based on SCAG data prepared for the 2016 RTP/SCS. Estimates for years presented in the table are based on interpolation of data presented in the 2016 RTP/SCS. Compiled by ESA, 2018.

*(b) Employment*

As reported in Table IV.J-1, the number of employees in the City of Los Angeles is expected to grow by 101,293, or six percent, by the time of Project buildout in 2022 as compared to 2016.

By 2040, the number of employees in the City of Los Angeles is expected to grow by 405,171, or 23 percent, as compared to 2016.

### 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 population, housing and employment 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 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 the Project's Population, Housing and Employment impacts evaluates whether the Project's housing, residential population, and employment creation are consistent with the future population, housing, and employment projections and related policies outlined above.

As explained above, because the Hollywood Community Plan and the Los Angeles citywide General Plan Framework EIR (1996) did not provide growth projections beyond 2010, the growth projections in those documents are out of date. However, the 2013–2021 Housing Element, which is based on the 2012 RHNA, identifies Los Angeles's share of the housing needs established in the RHNA. The Project is analyzed for consistency with the housing needed in the Housing Element and RHNA. In addition, the 2016 RTP/SCS, adopted in 2016, 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 from the 2016 RTP/SCS for the City of Los Angeles are analyzed with the Project and related projects growth to determine impacts.

The 2016 RTP/SCS forecasts represent the most 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.<sup>53</sup> Demographic data for 2012 and 2040 from the 2016 RTP/SCS, in addition to related projects data received from the City (provided in Appendix I of this Draft EIR) for determining cumulative projections for population, housing, and employment were used in the impact analyses.

The Project's residential population was calculated based on the citywide Person per Household Factor for multi-family units.<sup>54</sup> The number of employees was estimated using employee generation factors developed for a range of land uses by the Los Angeles Unified School District in its 2016 Developer Fee Justification Study.<sup>55</sup>

<sup>53</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, Resolution No. 16-578-2.

<sup>54</sup> United States Census Bureau, 2012-2016 American Community Survey, 5-Year Estimates. Based on the information provided in the American Community Survey, multi-family homes have a Person per Household Factor of 2.43, per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, January 11, 2018.

<sup>55</sup> Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2017.

Construction employment was estimated based on construction trip generation factors used in the SCAQMD California Emissions Estimator Model (CalEEMod) that is used for estimating air pollutant emissions. The values used in this analysis for construction employment are based on equipment types, the proposed building floor area, and the construction schedule provided by the Project Applicant described in more detail in Section IV.B, *Air Quality*, of this Draft EIR. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix C of this Draft EIR.

CEQA Guidelines Section 15131(a) states that economic or social effects of a project shall not be treated as significant effects on the environment. However, if a proposed project were to cause physical changes, then the physical effects, such as the construction of new infrastructure to accommodate increases in population, could be considered significant. Therefore, the analysis in this section is ultimately concerned with unplanned growth and whether such growth would translate to physical impacts on the environment. As such, a conflicting with or exceedance of population forecasts, in and of itself, is not a significant impact, even though the Appendix G question could imply such.

### **c) Project Design Features**

There are no Project Design Features that relate to population, housing and employment.

### **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)?***

#### **(1) Construction**

Construction of the Project would require the participation of construction workers who would be hired from a large, highly mobile regional construction work force already living and working within the Los Angeles metropolitan region 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 short duration of the work for each job, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities.

The number of construction workers needed for construction of the Project would vary on a day-to-day basis over the course of Project construction, ranging from an estimated five construction workers per day during early construction activity to 183 construction



workers during peak construction activity.<sup>56</sup> Based on the factors discussed above, the Project's construction jobs could be filled by workers from the regional construction force, without drawing new workers into the region to live. Consequently, Project construction would not contribute to population growth or generate demand for housing that would result in an adverse physical change in the environment, or necessitate the introduction of substantial new infrastructure not already in the Project Site area upon Project buildout. Accordingly, Project construction would have less than significant direct and indirect impacts related to population growth and therefore, to demand for housing or general housing occupancy and population patterns.

**Overall, based on the above, Project construction would not induce substantial direct or indirect population growth, and impacts would be less than significant.**

## (2) Operations

The Project would provide a mixed-use development with 210 multi-family residential units (104 one-bedroom units, 96 two-bedroom units, and 10 suites); an approximately 57,945 net square-foot hotel with 136 hotel rooms; and approximately 12,570 square feet of commercial/restaurant uses. Currently, there are a total of 44 residential units located<sup>57</sup> on the Project Site. The Project would remove all of the existing residences from the Project Site. Therefore, the Project would result in a net increase of 166 residential units (210 proposed residential units – 44 existing residential units = 166) when compared to existing conditions. The hotel and commercial/restaurant uses would add new employees and are assumed to add residents to the Hollywood Community Plan area and the City of Los Angeles (although many of the employees for future on-site uses would likely already live in the Project Site area, it is possible that some would relocate from areas outside the Hollywood Community Plan area or the City of Los Angeles, and as such, the analysis presented below is considered to be conservative). The Project's contribution to housing stock, residential population and employment opportunities is summarized in **Table IV.J-2, Project Increases in Population, Housing, and Employment**.

### (a) SCAG Forecasts

The anticipated Project increase within each of these categories is compared to growth projections in the SCAG's 2016 RTP/SCS for the city of Los Angeles in **Table IV.J-3, Project Population, Housing, and Employment Impacts**.

As reported in Table IV.J-2, the Project would result in a net increase of 166 residential units with an associated net increase in population of 403. The Project would also generate approximately 99 net, new full-time employment opportunities. As indicated in Table IV.J-3, the Project's net population increase would represent 0.3 percent of the projected citywide population growth in 2022.

<sup>56</sup> As stated in Section IV.K, *Transportation and Traffic*, Webcore Builders, in consultation with ESA, developed construction assumptions for the Project. This maximum level of worker activity represents a peak day and would occur for a short duration.

<sup>57</sup> Residential "suites" are larger floor area units located on the 19th and 20th floors.

**TABLE IV.J-2  
PROJECT INCREASES IN POPULATION, HOUSING, AND EMPLOYMENT**

<b>Total Housing Units</b>		<b>Average Household Size<sup>a</sup></b>	<b>Total Population (net increase)</b>
166 (net increase beyond existing conditions) <sup>b</sup>		2.43	403 <sup>c</sup>

<b>Use</b>	<b>Employees</b>	<b>Employment Generation Factor (per sq.ft.)<sup>d</sup></b>	<b>Number of Employees</b>
Hotel (sq.ft.)	57,740	0.00113	65
Commercial/Restaurant (sq.ft.)	12,570	0.00271	34
<b>Net New Employees</b>			<b>99</b>

<sup>a</sup> The draft Hollywood Community Plan Update being prepared by the City utilizes an estimated household size of 2 persons per unit. The Hollywood Community Plan Update is a long-range planning document that accounts for a wide range of development types that may occur over a 20-year period and therefore, its projected household size of 2 persons per unit does not specify unit sizes. For individual development projects for a specific site containing two-bedroom and larger units, it is more representative to utilize the average citywide household size calculated using data from the American Community Survey 5-year average rather than the draft Hollywood Community Plan Update. This Project proposes a range of studio, one-bedroom, and two-bedroom units, therefore this Draft EIR assumes the citywide 2.43 persons per unit factor.

<sup>b</sup> The Project proposes 210 multi-family residential units. However, the Project would remove the existing 44 residential units. Overall, the Project would result in a net increase of 166 residential units on the site when compared to existing conditions (210 proposed residential units – 44 existing residential units = 166).

<sup>c</sup> The Project's 210 dwelling units would generate a direct population increase of approximately 510 new people. However, the existing 44 residential units have an existing population of approximately 107 existing people. Overall, the Project would result in a net increase of approximately 403 people on the site when compared to existing conditions (510 new people – 107 existing people = 403).

<sup>d</sup> The employee generation factor for hotel and commercial uses is taken from the Los Angeles Unified School District, Developer Fee Justification Study, March 2017. As a separate rate is not provided for restaurant uses, the retail factor was used. The rate is for Neighborhood Shopping Centers.

SOURCE: ESA, 2019.

**TABLE IV.J-3  
PROJECT POPULATION, HOUSING, AND EMPLOYMENT IMPACTS**

	<b>Project Increase<sup>a</sup></b>	<b>SCAG Projected Growth<sup>b</sup></b>	<b>Project Percentage of Growth</b>
<b>Population</b>			
2016 - 2022 Buildout	403	163,393	0.3%
2016 - 2040 Planning Horizon	403	654,771	0.1%
<b>Households</b>			
2016 - 2022 Buildout	166	78,171	0.2%
2016 - 2040 Planning Horizon	166	312,685	0.1%
<b>Employment</b>			
2016 - 2022 Buildout	99	101,293	0.1%
2016 - 2040 Planning Horizon	99	405,171	0.02%

<sup>a</sup> From Table IV.J-2

<sup>b</sup> From Table IV.J-1

SOURCE: ESA, 2019. Based on SCAG 2016 RTP/SCS projections.

The Project's net new residential units would represent 0.2 percent of those projected citywide at Project buildout. Project employees would represent 0.1 percent of projected new employees citywide at Project buildout.

Project increases in population, housing, and employment fall within, and are therefore consistent with SCAG's growth projections for the period between 2016 and 2022, the Project buildout year, for the City of Los Angeles as a whole. Therefore, the potential for significant adverse physical impacts on the environment due to inconsistencies with growth projections would be less than significant.

It should be noted that the Project's contribution at Project buildout to the SCAG estimated population growth is 0.3 percent, and the Project's contribution to SCAG's estimated housing growth is 0.2 percent.

The Project would comprise a much smaller component of the growth forecast between 2016 and 2040 in the city of Los Angeles, representing only 0.1 percent of the added population increment, 0.1 percent of the added housing units, and 0.02 percent of the added employees. Impacts regarding these growth projections would be less than significant.

*(b) General Plan Housing Element/General Plan Framework*

As previously discussed, the purpose of the General Plan Housing Element is to provide guidance in meeting the City's need for housing as determined by the allocation made by SCAG in its RHNA. As noted above, the 2013 – 2021 Housing Element identifies a need

for 82,002 new housing units, of which 35,412 units, i.e. 43.2 percent of all units, would be marketed at above moderate income levels. 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) (percentages rounded up).

The Project would assist in meeting the City's housing needs by providing 210 new housing units. As discussed above, the Project Site is currently improved with 44 existing residential units. The Project would remove all of the existing residences from the Project Site. Overall, development of the Project would result in a net increase of 166 residential units on the Project Site when compared to existing conditions. The 166 units would represent 0.20 percent of the 82,002 needed units identified in the SCAG RHNA for the 2013 to 2021 planning period. The Project proposes to provide 100% of its 210 residential dwelling units as RSO units.

Further, as discussed in Chapter II, *Project Description*, the Project's residential units would be added at an infill housing location within an identified Transit Priority Area with access to public transportation, most notably along Argyle Avenue and Sunset Boulevard, and with a diverse range of retail, commercial, restaurant, office, and hotel job generating uses within a close radius. Therefore, the Project would support applicable housing policies of the City of Los Angeles.

As discussed in Section IV.H, *Land Use*, the majority of the Project Site and the entirety of the Project tower would be located within an area identified as a Regional Center in the City's General Plan Framework Element. Development of the Project would support the intent of the Regional Center designation by providing a mix of uses that provide employment opportunities and enhance commercial services, 210 new housing units, and 136 hotel rooms within the area, while still respecting lesser densities in the portion of the Project Site designed as Medium Residential under the General Plan. The provision of residential units would serve the needs of existing and future residents, would expand the diversity within the designated Regional Center, and provide housing in close proximity to commercial, retail, entertainment, and restaurant uses. The provision of hotel rooms would contribute a large number of hotel units to the area, thus supporting tourism and the economic viability of the entertainment, commercial, and tourist activities in the area. Development through the vicinity is generally well-served by transportation infrastructure including the Metro Red Line, numerous regional Metro Bus lines, and local LADOT Dash lines. Development of the Project would further support the intent of the Regional Center designation to encourage increased density in key areas of the City targeted for growth, while not resulting in significant adverse physical changes to the environment related to infrastructure and services available to support the Project. As such, the Project would support anticipated housing and employment growth projected within the City's General Plan.

(c) *Regional/SCAG Policies*

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies. Regional policies and goals, as well as future service demands, are based on SCAG projections. Projections in the SCAG 2016 RTP/SCS serve as the basis for demographic estimates in this analysis of Project consistency with growth projections.

Also, SCAG establishes policies pertaining to regional growth and efficient development patterns to reduce development impacts on traffic congestion and related increases in air quality emissions. These policies are discussed in Section IV.H, *Land Use and Planning*.

The 2016 RTP/SCS includes policies to provide an integrated approach to expanding the region's transportation system in concert with the encouragement of "Smart Land Use." Smart land use strategies encourage walking, biking, and transit use, to reduce vehicular demand and therefore, to save travel time, reduce pollution, and improve health. SCAG has been working with subregions and local communities to increase development densities and improve the jobs/housing balance. A component of SCAG's strategy has been to focus new growth in HQTAs (i.e., the three percent of total land area in the SCAG region that is within one-half mile of a fixed guideway transit stop or bus transit corridor). Providing new growth in the Hollywood Community Plan area is an integral component of this strategy.

Project growth would support the attainment of these SCAG policies by increasing population density in an area already well served by public transit, including various public transit stops operated by Metro located in close proximity to the Project Site. The nearest Metro Red Line station, at Hollywood Boulevard/Vine Street, is located one block or approximately 0.13 miles southwest of the Project Site. The Project Site area is also served by bus lines operated by LADOT's Downtown Area Shuttle (DASH). The Project Site is also located in proximity to a broad array of retail and entertainment destinations that are accessible to pedestrians. The Project would be located within a HQTA that is targeted for future growth because of the multiple environmental benefits associated with providing high-density development along transit corridors.<sup>58,59</sup> The Project's mixed-use components and contributions to walkable communities would also contribute to the attainment of the SCAG policies. The Project would also meet the State's goals set forth in SB 743 because it is (1) located within a transit priority area less than one-half mile from a Metro Red Line Station, and (2) is an infill project within an established urban area. Therefore, the Project would support SCAG policies with a high-density mixed-use infill development in proximity to public transit, which would all serve to reduce VMT.

The Project's population growth contributes to an infill growth pattern that is encouraged locally by the City, regionally, in SCAG policies, and Statewide, in SB 375, SB 743, and

<sup>58</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 8.

<sup>59</sup> Southern California Association of Governments, 2016 Regional Transportation Plan/Sustainable Communities Strategy, page 77.

other legislation, for development that reduces reliance on individual automobiles, with related lessening of impacts on the environment. The City has in recent years participated in efforts to promote development patterns that will reduce vehicle miles traveled and provide reductions in energy consumption and air quality emissions, as well as convenience for commuters. These efforts are consistent with a local jurisdiction's responsibility to support SCAG's RTP/SCS regional guidance in smart growth development and State efforts to meet goals for the reduction of greenhouse gas emissions. The Project's development at the Project Site would support the attainment of the SCAG policies by providing increased population density and employment opportunities in a well-served HQT. Therefore, the Project's design and location support SCAG's short-term and long-term growth projections for the City of Los Angeles. Further, impacts that may potentially occur on the physical environment that may be associated with direct Project growth are addressed throughout this Draft EIR, as appropriate.

**For all of these reasons, the Project's contribution to population growth would be consistent with SCAG population projections for the City of Los Angeles for the period of 2016-2040, and therefore the Project's contribution to long-term population growth would be less than significant.**

*(d) Infrastructure*

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. The Project Site is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. The Project's only off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project area. Impacts that may potentially occur on the physical environment that may be associated with Project growth are addressed throughout the Draft EIR. As discussed in Sections IV.J, *Public Services* and IV.N, *Utilities and Service Systems*, City services and infrastructure to support Project growth have been evaluated at the Project level and would be sufficient to serve the Project. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. No new roadways would be created as part of the Project. Thus, the Project would not open inaccessible sites to new development other than existing opportunities for development that are already available. As discussed in Section IV.L, *Transportation*, potential conflicts with transportation-related plans, ordinances, or policies, increase in vehicle miles traveled, and increased hazards due to a geometric design feature or incompatible use resulting from Project development would be less than significant with implementation of the identified mitigation measures, where necessary. Therefore, the Project would not induce substantial population growth to the area other than that already anticipated and would not eliminate impediments to growth. Impacts would be less than significant.

*(e) Conclusion*

**Based on the above analyses, the Project would not induce substantial population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Thus, impacts would be less than significant.**

***Threshold (b): Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

*(1) Existing Housing*

As discussed above, the Project Site is currently improved with 44 existing residential units which contain a residential population assumed to be approximately 107 people for purposes of this analysis.<sup>60</sup> The Project would require the demolition of all on-site housing. Development of the Project would result in a net increase of 166 dwelling units on the Project Site when compared to existing conditions within the City of Los Angeles. Thus, the construction of replacement housing elsewhere would not be necessary. Furthermore, the number of dwelling units that would be temporarily removed by the Project would only be temporarily removed during construction before an increased number of units are built and represents a small fraction of the housing growth expected citywide by Project buildout and would not constitute a substantial number of the area's dwelling units. **Thus, the Project would not displace substantial numbers of existing housing such that the construction of replacement housing elsewhere would be required. As such, the Project would result in a less than significant impact.**

*(2) Replacement Housing*

Development of the Project would result in a net increase of 166 dwelling units on the Project Site within the City of Los Angeles. Thus, the construction of replacement housing elsewhere would not be necessary.

*(a) RSO Unit Replacement*

Forty-three (43) of the existing 44 on-site residential units are subject to the City's RSO.<sup>61</sup> The RSO imposes replacement unit requirements where RSO units are eliminated.<sup>62</sup> To comply with these requirements, the Project proposes to provide 100 percent of its 210 residential dwelling units as RSO units. The Project would thus result in a net increase of 167 RSO dwelling units, resulting in a notable increase in the City's stock of such units

<sup>60</sup> The on-site residential population is conservatively assumed to be 88 people based on the average household size of 2.43 based on the 2016 American Community Survey 5-year average estimate (2012-2016).

<sup>61</sup> RSO contained in LAMC Chapter XV.

<sup>62</sup> LAMC §151.28.

in Hollywood and the City as a whole. Accordingly, the Project would result in no effects with respect to the replacement of RSO housing units.

In addition to not requiring the construction of replacement housing elsewhere, the proposed demolition of 44 housing units would not impact a “substantial number of people” and is therefore not an impact on “the environment of persons in general” that would fall within the purview of CEQA.<sup>63</sup> The RSO also includes local regulations that implement the Ellis Act, a state law that, in conjunction with the RSO, provides at least four months of notice to residents before an eviction can occur and one year of notice for residents who are elderly or disabled, or those that have children.<sup>64</sup> Under the RSO, project applicants are also required to provide relocation assistance to any existing tenants of RSO units in the form of a specified monetary payment set by the RSO to cover relocation expenses. In compliance with these requirements, existing tenants on the Project Site would be provided monetary relocation assistance as required by the RSO. In addition, as set forth in Chapter II, Project Description, of this Draft EIR, the Project would provide all such tenants a right of return to comparable units within the Project at their last year’s rent plus applicable annual increases under the RSO once the Project is occupied. During construction, the Project would fund the difference in rent between the tenants’ current rent and new rent until the right of return is exercised. As indicated above, while the effects of displacement on existing tenants are not CEQA impacts, these provisions effectively eliminate negative effects on tenants associated with the demolition of existing onsite units. **Thus, the Project would not displace substantial numbers of existing people such that the unplanned construction of replacement housing elsewhere would be required. In addition, impacts from the demolition of existing housing would be less than significant.**

**As such, the Project would result in a less than significant impact for Threshold (b).**

## **e) Cumulative Impacts**

This cumulative impact analysis addresses the impacts of known and anticipated development in the Project Site vicinity, in combination with the Project, with respect to projected amounts and distribution of population, housing, and employment. The related projects included in this analysis are listed in Table III-1 of Chapter III, *Overview of Environmental Setting*, of this Draft EIR. The calculation of the cumulative population, number of housing units, and number of employees is provided in **Table IV.J-4, Cumulative Increases in Population, Housing, and Employment**. As shown therein, it is estimated that the Project plus related projects would construct a total of 16,683 housing units and generate 40,541 new residents and 40,329 new employees.

<sup>63</sup> See *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 782-86; *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188, 195.

<sup>64</sup> Cal. Gov’t Code §§ 7060 et seq.



**TABLE IV.J-4  
CUMULATIVE INCREASES IN POPULATION, HOUSING AND EMPLOYMENT**

	<b>Housing Units</b>	<b>Average Household Size<sup>a</sup></b>	<b>Population</b>
Related Projects <sup>b</sup>	16,517	2.43	40,137
Proposed Project	166	2.43	403
<b>Total Cumulative Growth</b>	<b>16,683</b>		<b>40,540</b>

<b>Use</b>	<b>Quantity</b>	<b>Employment Generation Factor (per unit)<sup>c</sup></b>	<b>Number of Employees</b>
<b>Related Projects<sup>b</sup></b>			
Office (sq. ft.)	5,855,219	0.00479	28,077
Commercial/Retail/Restaurant (sq. ft.)	3,370,321	0.00271	9,134
Hotel (sq. ft.)	2,391,000	0.00113	2,702
School (students)	--	--	18
Others <sup>d</sup> (sq. ft)	67,991	0.00304	207
<b>Total - New Employees</b>			<b>40,230<sup>e</sup></b>
Proposed Project			99
<b>Total Cumulative Growth</b>			<b>40,329</b>

<sup>a</sup> The average household size reflects the average household size based on the 2016 American Community Survey 5-year average estimate (2012-2016).

<sup>b</sup> A list of the related projects is provided in Table III-1 of Chapter III of this Draft EIR.

<sup>c</sup> The employee generation factor for office, retail, and hotel uses is taken from the Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. As a separate rate is not provided for commercial and restaurant uses, the retail factor (Neighborhood Shopping Centers) was used.

<sup>d</sup> Other land uses include such uses as storage, sound stage, and other land uses.

<sup>e</sup> Total may not add up due to rounding.

SOURCE: ESA, 2018.

Cumulative growth is compared to projected growth in the City of Los Angeles in **Table IV.J-5, Cumulative Population, Housing and Employment Impacts**. Projections focus on the 2016 RTP/SCS 2040 horizon year as opposed to the Project's 2022 buildout date. This is the appropriate timeframe for evaluating cumulative impacts related to population, housing, and employment growth since anticipated development will occur over a longer time frame beyond Project buildout, and year to year variations in development average out over the longer term horizon projections. Current growth trends will be accounted for in the 2016 RTP/SCS, 2020 RTP/SCS, and 2024 RTP/SCS.

**TABLE IV.J-5  
CUMULATIVE POPULATION, HOUSING AND EMPLOYMENT IMPACTS**

	<b>Cumulative Increase<sup>a</sup></b>	<b>SCAG Projected Growth<sup>b</sup></b>	<b>Cumulative Percentage of Growth</b>
Population	40,540	654,771	6%
Households	16,683	312,685	5%
Employment	40,329	405,171	10%

<sup>a</sup> From Table IV.J-4

<sup>b</sup> From Table IV.J-1

SOURCE: Based on the SCAG 2016 RTP/SCS projections. ESA, 2018.

Table IV.J-5 compares projected cumulative growth inclusive of the Project to 2040 horizon year projections in the 2016 RTP/SCS. The related projects include a broad array of housing, retail, commercial, restaurant, office and hotel uses. As noted above and reflected in Table IV.J-4, cumulative development would create 16,683 residential units providing housing for a population of 40,541, and 40,329 employees. As shown in Table IV.J-5, population growth would comprise approximately six percent of the citywide population growth by the 2040 horizon year. The new units developed by related projects would represent approximately five percent of expected households citywide. The number of new employees would represent approximately 10 percent of new employees citywide.

As discussed in Section IV.H, *Land Use and Planning*, the Project would be located within the area identified in the 1988 Hollywood Community Plan as Regional Center Commercial and it is within an area identified as a Regional Center in the City's Framework Element. As such, the Project's uses have been anticipated and the Project Site has been identified for new housing and employment growth.

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. Impacts that may potentially occur on the physical environment that may be associated with Project growth are addressed throughout the Draft EIR. As discussed in Sections IV.K, *Public Services*, IV.L, *Transportation*, and IV.N, *Utilities and Service Systems*, the Project Site is located in an urbanized area that is sufficiently served by current infrastructure (e.g., roads and utilities), and community service facilities. The Project's off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project area. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. No new roadways would be created as part of the Project. Thus, the Project would not open inaccessible sites to new development other than existing opportunities for development that are already available. Based on these factors and as further discussed in Sections

IV.K, *Public Services*, and IV.N, *Utilities and Service Systems*, the Project's contribution to cumulative impacts on infrastructure, including public services and utilities would not be cumulatively considerable. Of the related projects, none are new unplanned infrastructure projects that would open new areas for development or increase the infrastructure capacity of the Hollywood area. Hollywood contains a mature system of service, utility and infrastructure facilities. The cumulative development consists largely of mixed-use infill projects that would generally tie-in to existing utility lines and add project-specific related infrastructure, where necessary, on a project-by-project basis. Finally, as analyzed in Section IV.L, *Transportation*, potential conflicts with transportation-related plans, ordinances, or policies, increase in vehicle miles traveled, and increased hazards due to a geometric design feature or incompatible use resulting from Project development would be less than significant with implementation of the prescribed mitigation measure, where necessary. Future related projects would be required on a project-by-project basis to implement Transportation Demand Management Programs, where appropriate, to reduce vehicle miles traveled and ensure an effective transportation infrastructure system.

Overall, the Project together with the related projects would not involve significant adverse direct or indirect physical changes to the environment due to increases in population, housing, and employment it would create, falling well within projected growth for the City, as indicated above in Table IV.1.5. Further, the increase in the number and variety of housing units and commercial uses provided by the Project and related project in the Hollywood Community Plan area would provide needed housing and jobs in close proximity to each other within an HQTAs. In turn, this would reduce environmental impacts by contributing to sustainable development patterns, consistent with regional and City policies. **As such the Project's impacts regarding population, housing and employment would not be cumulatively considerable, with cumulative impacts being less than significant.**

## **f) Mitigation Measures**

Project impacts regarding population, housing and employment would be less than significant. Therefore, no mitigation measures are required.

## **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to population, housing and employment would be less than significant and no mitigation measures are required.

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## **IV. Environmental Impact Analysis**

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### **K.1. Public Services – Fire Protection**

#### **1. Introduction**

This section of the Draft EIR analyzes the Project’s potential construction and operational environmental impacts on fire protection and emergency medical services provided by the City of Los Angeles Fire Department (LAFD). This analysis addresses whether the Project would create potential impacts to fire protection facilities and emergency medical services, response times, emergency access, water infrastructure, and fire flow (i.e. water available for firefighting) that 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 and the *Water System and Supply Report for the 6220 West Yucca* (herein referred to as the “Water System and Supply Report”), prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. The information provided by the LAFD is contained in Appendix K, of this Draft EIR. The Water System and Supply Report is contained in Appendix N, of this Draft EIR.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) Federal**

The federal and California Occupational Safety and Health Administrations 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. The fire-related regulations under 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-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

## (2) State of California

### (a) *California Building Code and California Fire Code*

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 (CFC) is part of the CBC.<sup>1</sup> Typical fire safety requirements of the CFC 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 CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific CFC regulations have been incorporated by reference with amendments, in the Los Angeles Building Code, Fire Safety Regulations, as discussed below.

### (b) *California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution, 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 30051-30056 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 emergency medical services, and that it is reasonable to conclude that a city will comply with that provision to ensure that public safety services are provided.<sup>2</sup> 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

<sup>1</sup> California Building Standards Commission, California Building Standards Code (California Code of Regulations, Title 24), Part 9, California Fire Code, website, Available at: <https://codes.iccsafe.org/content/chapter/15583/>, accessed November 2017.

<sup>2</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal Ap. 4th 833, 847

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.”<sup>3</sup>

(c) *California Fire Service and Rescue Emergency Mutual Aid System*

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Emergency Management Agency, 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), as managed by the Governor’s Office of Emergency Services (OES).<sup>4</sup> 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 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.

(3) *City of Los Angeles*

(a) *Los Angeles General Plan Framework*

The City of Los Angeles 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.<sup>5</sup> Specific fire protection and emergency medical service goals and objectives within the General Plan, Chapter 9, Infrastructure and Public Services, that are applicable to the Project include:<sup>6</sup>

**Goal 9J:** Every neighborhood has the necessary level of fire protection service, emergency medical service and infrastructure.

**Objective 9.16:** Monitor and forecast demand for existing and projected fire facilities and service.

<sup>3</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal Ap. 4th 833, 847, 843

<sup>4</sup> California Emergency Management Agency, Fire and Rescue Division, California Fire and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised February 2012. Available at: [https://www.caloes.ca.gov/FireRescueSite/Documents/CalOES\\_-\\_Fire\\_and\\_Rescue\\_-\\_Mutual\\_Aid\\_Plan.pdf](https://www.caloes.ca.gov/FireRescueSite/Documents/CalOES_-_Fire_and_Rescue_-_Mutual_Aid_Plan.pdf). Accessed July 29, 2019.

<sup>5</sup> City of Los Angeles, General Plan Framework, Chapter 9 – Infrastructure and Public Services, <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>

<sup>6</sup> City of Los Angeles, General Plan Framework, Chapter 9 – Infrastructure and Public Services, Recreation and Parks, Goal 9J, <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>

**Objective 9.17:** Assure that all areas of the City have the highest level of fire protection and emergency medical services, at the lowest possible cost, to meet existing and future demand.

(b) *General Plan Safety Element*

The General Plan Safety Element, adopted on November 26, 1996,<sup>7</sup> contains policies related to the City's response to hazards and natural disasters. The specific fire protection and emergency medical policy within the General Plan Safety Element that is applicable to the Project includes:<sup>8</sup>

**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.)

The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for 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 and emergency medical event response.

(c) *Hollywood Community Plan*

The 1998 Hollywood Community Plan provides five policies and one objective regarding fire protection.<sup>9</sup> Policy 1 requires continuous evaluation and updating of the fire protection/emergency medical services system by the Fire Department in coordination with other City Departments; Policy 2 recommends that the siting of new facilities be planned and designed to minimize the displacement of housing and relocation and residents. Policy 3 directly pertains to activities associated with private development, which states, "that public education activities concerning the elimination of fire hazards, methods of fire protection and emergency medical service be encouraged." Policy 4 calls for evaluation of and improvements to the paramedic program. Policy 5 calls for an intensified program of weed abatement for fire protection.<sup>10</sup> Objective 5 provides a basis for the location and programming of public services and utilities and coordinates the phasing of public facilities with private development.

<sup>7</sup> City of Los Angeles, Safety Element. Approved November 26, 1996. [https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\\_Element.pdf](https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf). Accessed September 2019.

<sup>8</sup> Los Angeles, Safety Element. Approved November 26, 1996. Policy 2.1.6, page III-3. <https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf>

<sup>9</sup> City of Los Angeles. Hollywood Community Plan, December 13, 1988, <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed August 26, 2019.

<sup>10</sup> City of Los Angeles. Hollywood Community Plan, December 13, 1988, Polices 1 through 5, pages HO-4 and HO-5, <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed August 26, 2019.



(d) *Los Angeles Municipal Code and Charter*

As detailed in Chapter V, Public Safety and Protection, Article 7, Fire Protection and Prevention (Fire Code) of the Los Angeles Municipal Code (LAMC), 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 establishes minimum requirements, consistent with nationally recognized good practice, for providing a reasonable level of life safety and property protection from the hazards of fire, explosion, panic, or dangerous conditions in new and existing buildings, structures, and premises and to provide safety to firefighters and emergency responders during emergency operations.<sup>11</sup>

Volume I, Governance, Article V, Departments, Fire Department, Section 520, Powers and Duties of the Department, of the Los Angeles Charter, requires the LAFD 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.

Article 7, Fire Protection and Prevention (Fire Code) Section 57.118, of the LAMC, New Construction Plan Review and Inspection, sets forth the responsibilities of the LAFD to perform Fire/Life Safety Plan Review and Fire/Life Safety Inspection for certain projects and to collect the fees for those services. Section 57.118.1.1, Fire/Life Safety Review, provides that high rise buildings with human occupancy at 75 feet or higher, as measured from occupied floor or occupied roof elevation above the lowest level of Fire Department vehicle access, are subject to the new construction plan review and inspection.

Under LAMC Section 57.408, every owner, manager, operator, administrator, and tenant of a new high-rise building must, in cooperation with the Fire Department, establish, implement, maintain and update an Emergency Plan for the building 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 is required to designate at each building a Fire Safety Director, Floor Wardens, Private First Responders, and Essential Building Personnel. Among other tasks, these individuals are required to call 911 during an emergency incident; report to the building's Emergency Assistance Center; direct evacuation operations; report conditions to the LAFD; conduct monthly inspections; know the location of all exits; direct emergency evacuations and fire drills; and assist the LAFD, emergency responders, and on-site personnel during emergency evacuations. A description of the procedures all occupants should follow in an emergency evacuation or drill is also required to be included in the Emergency Plan. The Emergency Plan also designates appropriate evacuation signs and requires the Fire Safety Director to establish the on-site Emergency Assistance Center. Lastly, Section 57.408.9.2.1, Mandatory Drill, requires that mandatory fire drills be conducted at least once annually. Under LAMC Section 57.408.9.5, a Fire Safety Officer is required to be present to witness and document the total building evacuation.

<sup>11</sup> City of Los Angeles Municipal Code, Chapter V, Article 7, Section 57.101.3, Intent.

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 57.409.8.4 of the LAMC, Emergency Assistance Center, requires that the Fire Safety Director (defined as an employee of the owner or manager or resident of the building and designated as the Fire Safety Director by the owner, administrator, or manager of a high-rise building), with the approval of the Fire Department to establish as part of every Emergency Plan an Emergency Assistance Center where the Fire Safety Director or Assistant Fire Safety Director and other selected personnel report during an emergency incident. The Fire Safety Director must also assign a responsible person to meet and direct the Fire Department to the location of the emergency incident. The Emergency Assistance Center may include a fire control room, lobby or safe refuge area outside of the building. Section 57.907.2.13.2.1, Fire Department Voice Communication System, requires a sound-powered telephone communication system capable of communication between all required locations and between such locations and the building control station.<sup>12</sup>

For new high-rise buildings, LAMC Section 57.4705.1.6, Fire Control Elevator, requires that there be at least one emergency and fire control elevator in each bank of elevators for fire emergency service and that its controls be designed so that key switches located in the building control station/fire command center will recall the elevator or elevators to the designed main floor. The elevator or elevators must be interconnected with standby power, that can be transferable to any other elevator in the bank and be capable of operating the elevator with a full load. In addition, buildings must have a dependable method of sounding a fire alarm throughout the building (Section 57.907, Fire Alarm and Detection Systems), an emergency smoke control system (Section 57.909, Smoke Control Systems), a standby and emergency power system (Section 57.604, Emergency and Standby Power Systems), stair shaft doors for fire department use (Section 57.409.9.4, Buildings that have stair shaft doors locked), and other devices operable from the fire control station, as previously listed. All high-rise buildings (greater than 75 feet in height) must be equipped with an automatic sprinkler system (LAMC Section 91.8604, Fire Extinguishing Systems). Per LAMC Section 57.4704.5, Smoke Detector Maintenance, smoke detector maintenance must comply with Sections 57.4704.5.1 through 57.4704.5.5. All smoke detectors must be maintained in dependable operating condition and tested every six months or as required by the Chief (Section 57.4704.5.1, Testing). In addition, no person may use, maintain, or allow to exist any portable, fuel-burning, unvented room heater in any residential occupancy or compressed gases or liquefied flammable gases (Section 57.4704.8, Unvented Portable Heaters). Chapter IX, Building Regulations, Article 1, Buildings, of the LAMC, Division 7, Fire Resistant Materials and Construction, requires the use of fire-resistive building materials. Division 9, Fire Protection Systems, Section 91.909.3, Special Inspection and Test Requirements, of the Building Code, requires that all smoke control systems be tested prior to the issuance of a

<sup>12</sup> City of Los Angeles Municipal Code, Article 7, Fire Protection and Prevention (Fire Code), available at: [http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfire?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles\\_ca\\_mc\\$anc=JD\\_C5A7](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfire?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc$anc=JD_C5A7). Accessed July 28, 2019.

Certificate of Occupancy and, after occupancy of the building, all operating parts of the smoke-control systems shall be retested every six months in accordance with the retest requirements established by the Department of Building and Safety and the LAFD.

Section 57.1022.9.2, Stairway Identification System, requires a stairway identification system for buildings three or more stories in height. The sign must indicate the floor level, the lower and upper termination of the stairway, whether or not there is roof access, and the identification of the stairway.

The Fire Code also addresses access, hydrants, fire flow requirements, and response distances. If any portion of the first story exterior walls of any building structure is more than 150 feet from the edge of the roadway of an approved street, an approved fire lane must be provided so that such portion is within 150 feet of the edge of the fire lane (Section 57.503.1.4, Building Structure more than 150 Feet from the edge of the roadway). Per Section 57.507.3, Fire Flow, fire flow requirements for buildings or portions of buildings and facilities will be determined by an approved method as set forth in Sections 57.507.3.1 through 57.507.3.3 and shall comply with Table 57.507.3.1, Fire-Flow by Type of Land Development. Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is 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.<sup>13</sup>

Section 57.512.1 of the LAMC, Response Distances, limits the maximum response distances to an LAFD station based on type of land use (Table 57.507.3.3., Response Distances that if Exceeded Require the Installation of an Automatic Fire Sprinklers Systems). The maximum response distance from a high-density residential and commercial development to a fire station is 1.5 miles for an engine company and two miles from a truck company. Per Section 57.507.3.2, Fire Hydrant Spacing, fire hydrant spacing and hydrant type is also determined according to land use (Table 57.507.3.2, Fire Hydrant Spacing). For high-density residential and neighborhood commercial, one hydrant per 100,000 square feet of land is required with a 300 to 450 feet distance between hydrants. Furthermore, every first story of a residential unit must be within 300 feet of an approved hydrant. Section 57.513, Supplemental Fire Protection, provides for supplemental fire protection in which equipment and systems not otherwise required in the LAMC may be required by the LAFD.<sup>14</sup>

Per LAMC Section 57.4705.4, Emergency Helicopter Landing Facility, a rooftop emergency helicopter landing facility (EHLF) is required on each high-rise building in a location approved by the Chief of the LAFD, unless specific life safety features are provided as outlined in LAFD

<sup>13</sup> LAMC Article 7, op. cit.

<sup>14</sup> LAMC Article 7, op. cit

Requirement No. 10.<sup>15</sup> Such life safety measures include: providing an additional Fire Service Access Elevator in addition to the number of elevators required in the CBC; two (2) stairways (and a third if added) shall have roof access; enclosed elevator lobbies; escalator openings or stairways that are not part of the means of egress system and connect more than two stories protected by approved power-operated automatic shutters at every penetrated floor; automatic sprinkler systems; and a Video Camera Surveillance System with cameras located in all Firefighter Elevator Vestibules and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft.

(e) *Propositions F, J and Q*

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated \$532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Proposition F was amended by Measure J in 2006 to provide flexibility in the design of new facilities, and set standards for such facilities. Proposition F allocated \$378.6 million to build 18 new or replacement neighborhood 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.<sup>16</sup>

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. Currently under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least two acres to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Measure J allows new regional fire stations funded by Proposition F located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can be built on two or more sites within proximity, or the facility can be designed to fit on a single site of less than two acres.

Proposition Q, the Citywide Public Safety Bond Measure, 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

<sup>15</sup> Los Angeles Fire Department Requirement No. 10, Emergency Helicopter Landing Facilities (EHLF) Requirements, prepared by the Office of the Fire Marshal, revised November 17, 2014, <http://issuu.com/lafd/docs/ehlf-requirements?e=17034503/31362470>, accessed July 2017.

<sup>16</sup> Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb-March 2016. Available at: [http://eng2.lacity.org/projects/fire\\_bond/documents/current\\_monthly\\_report.pdf](http://eng2.lacity.org/projects/fire_bond/documents/current_monthly_report.pdf). Accessed July 29, 2019.

improvements. Per the February/March 2016 Proposition Q Progress Report, 76 of the 80 renovation projects have been completed.<sup>17</sup>

## b) Existing Conditions

### (1) LAFD Fire Protection Facilities, Services, and Response Times

Fire prevention, fire suppression, life safety and emergency medical services within the City of Los Angeles 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 approximately 3,246 uniformed personnel and 353 professional support personnel provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.<sup>18</sup> At any given time, there are approximately 1,018 uniformed firefighters, including 270 serving as firefighter/paramedics, on-duty at 106 fire stations across the LAFD's approximate 471-square-mile jurisdiction.<sup>19</sup>

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. The Operations West Bureau is stationed at Fire Station 82 in the Hollywood Community and is 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/Crash Rescue, LAX/Terminal Area, LAX Area/Hotel District, Los Feliz, Mar Vista, Pacific Palisades, Palisades Highlands, Playa Vista, Silver Lake, Venice, West Los Angeles, Westchester/LAX Area, and Westwood/UCLA.<sup>20</sup>

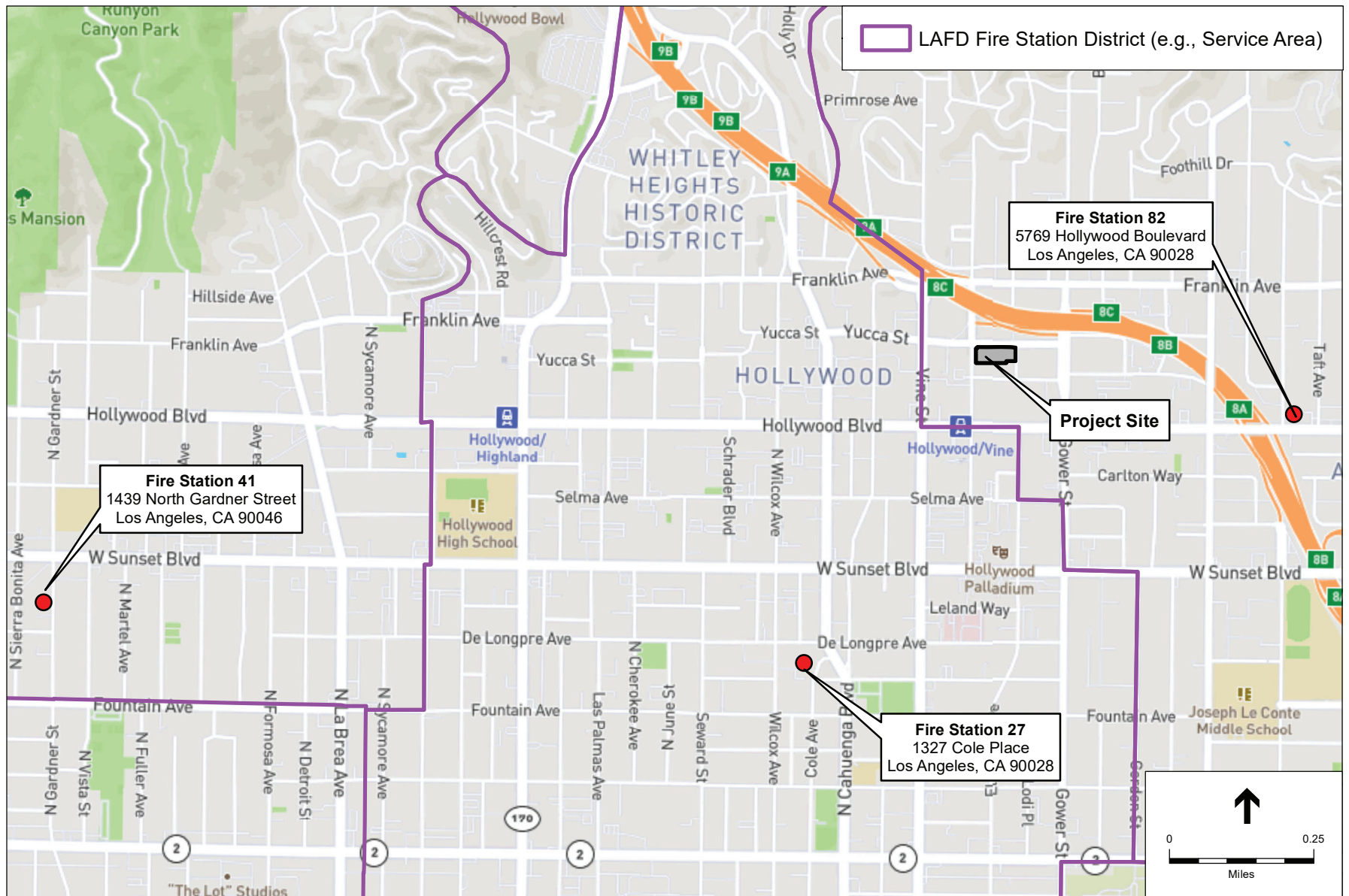
As shown in **Figure IV.K.1-1, Fire Stations Located in the Vicinity of the Project Site**, there are three fire stations that provide primary fire protection and emergency medical services to the Project Site and surrounding area. **Table IV.K.1-1, Fire Stations Located in the Project Vicinity**, includes the location, distance/direction from the Project Site, staffing, equipment, and the average operational response times for emergency medical services (EMS), non-emergency medical services (Non-EMS), advanced life support (ALS) critical, and structure fires for each of these fire stations. The EMS category includes incident types that require minimum personal protective equipment (PPE) and a turn out time of 60 seconds.

<sup>17</sup> City of Los Angeles, Department of Public Works, Bureau of Engineering, 2002 Proposition Q Citywide Safety Bond Program, Monthly Progress Report February/March 2016, <http://www.lapropq.org/modules/fileUpload/files/Prop%20Q%20Monthly%20Feb%20Mar%202016%20Report.pdf>, accessed July 2017 (Appendix K to this Draft EIR)

<sup>18</sup> Los Angeles Fire Department Website, LAFD Overview, Our Mission. Available at: <http://lafd.org/about/lafd-overview>, accessed July 2017.

<sup>19</sup> These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions (Source: Los Angeles Fire Department Website, LAFD Overview, Our Mission. Available at: <http://lafd.org/about/lafd-overview>, accessed July 2017).

<sup>20</sup> Los Angeles Fire Department Website, West Bureau, <http://www.lafd.org/about/west-bureau>, accessed November 2017.



SOURCE: Open Street Map 2017; City of Los Angeles Open Data:  
<https://data.lacity.org/>; Accessed January 2017; ESA, 2017.

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**Figure IV.K.1-1**

Fire Stations Located in the Vicinity of the Project Site

**TABLE IV.K.1-1  
FIRE STATIONS LOCATED IN THE PROJECT VICINITY**

<b>Station No. and Location</b>	<b>Distance/ Direction From Project Site <sup>a</sup></b>	<b>Average EMS/ Non-EMS (Fire Incident)/ ALS Critical/ Structure Fire/ Operational Response Time<sup>b</sup></b>	<b>Staffing (24 hour duty)</b>	<b>Equipment <sup>c</sup></b>
Fire Station 82 5769 Hollywood Boulevard Los Angeles	0.50 miles east (0.70 miles)	6:11 minutes EMS 6:31 minutes Non-EMS 5:16 minutes ALS Critical 4:59 minutes Structure Fire	6 firefighters	1 Engine Company (BLS) 1 Ambulance Unit (ALS)
Fire Station 27 1327 North Cole Avenue Los Angeles	0.60 miles southwest (1.0 miles)	6:23 minutes EMS 5:40 minutes Non-EMS 5:12 minutes ALS Critical 5:15 minutes Structure Fire	15 firefighters	1 Truck Company (ALS) 1 Engine Company (BLS) 2 Ambulance Units (ALS)
Fire Station 41 1439 North Gardner Street Los Angeles	1.65 miles southwest (2.1 miles)	6:45 minutes EMS 7:11 minutes Non-EMS 5:55 minutes Critical ALS 5:13 minutes Structure Fire	8 firefighters	1 Engine Company (ALS) 2 Ambulance Units (ALS and BLS)

**NOTES:**

<sup>a</sup> Approximate distance/direction from Project Site in miles is a straight line distance. Approximate drive distance is shown in parenthesis.

<sup>b</sup> LAFD Operational Response Time: the time interval that starts when first contact is made (either through 911 or the fire dispatch center) and ends when the first standard unit arrives on-scene. LAFD Call Processing Time = the time interval that starts when the call is created in the computer aided dispatch (CAD) system by a Fire Dispatcher until the initial fire or EMS unit is dispatched. Turnout Time = the time interval between the activation of station alerting devices to when first responders put on their PPE and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds. Travel Time = the time interval that begins when the first unit is en-route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time. Standard Unit = a unit with the capacity or equipment to administer the full suite of lifesaving services. Other units are only deployed in special circumstances and lack either the capacity or equipment to deliver the full suite of lifesaving services. Data available from January 2016 through December 2016 (the latest whole year for which fire response times were available).

<sup>c</sup> A truck company consists of an aerial ladder truck staffed by six employees (i.e., captain II, an apparatus operator, an engineer, and three firefighters). An engine company consists of a fire engine staffed by four employees (i.e., a captain I, an engineer, and two firefighters). BLS (Basic Life Support) ambulances are staffed by firefighters/EMT-Ds (emergency medical technician – defibrillator trained). An advanced life support (ALS) ambulance unit consists of an ambulance staffed by two firefighters/paramedics.

SOURCE: Los Angeles Fire Department, FireStatLA website, <http://www.lafd.org/fsla/stations-map>, accessed July 2017. Correspondence from Captain David Sifuentes, Commander, Hydrant and Access Unit and Captain Luke Milick, Commander, Hydrant and Access Unit, Los Angeles Fire Department (Appendix K to this Draft EIR).

The majority of EMS incidents are medical in nature and do not require the use of fire suppression tools and equipment. The Non-EMS category, or fire incidents, includes incidents that require full PPE and a turn out time of 80 seconds. The majority of Non-EMS incidents require the use of fire suppression tools and equipment and may result in patients that require medical evaluation and treatment. The ALS Critical category includes incidents that are marked for immediate dispatch, which includes most types of critical incidents. The structure fire incidents category includes buildings or structures that are reported to be actively burning.

As shown in Table IV.K.1-1, Fire Station 82 at 5769 Hollywood Boulevard is located nearest to the Project Site and is the first due fire station, which is the fire station with primary responsibility for the Project Site. Fire Station 82 is located approximately 0.50 miles east of the Project Site. The other two stations within close proximity of the Project Site are Fire Stations 27 and 41, located at approximately 0.60 miles south and 1.65 miles west, respectively, of the Project Site.

As shown in Table IV.K1-1, the average EMS incident operational response times range from 6:11 minutes from Fire Station 82 to 6:45 minutes from Fire Station 41, and the Non-EMS incident operational response times range from 5:40 minutes from Fire Station 27 to 7:11 minutes from Fire Station 41. The average ALS critical operational response times range from 5:12 minutes from Fire Station 27 to 5:55 minutes from Fire Station 41, and the average structure fire operational responses range from 4:59 minutes from Fire Station 82 to 5:15 minutes from Fire Station 27.

It should be noted, however, that the operational average response times are not necessarily representative of the actual time required to reach the Project Site from any of these fire stations, but is simply an indication of the average time needed to reach any given destination within each station's respective service area. Actual response time to a given site would depend on individual factors such as distance between a fire station and a site, and roadway characteristics as well as topography (i.e., a response time would be greater for hillside areas with narrow roadways).

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in the 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* ruling decision<sup>21</sup>, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical

<sup>21</sup> *City of Hayward v. Trustees of California State University* (2015) 242 Cal. App.4th 833, 843-47.



services. **Table IV.K.1-2, *Fire and Paramedic Incident Data (Annual)***, below, provides a listing of the numbers of EMS and Non-EMS responses for each of the three fire stations located near the Project Site that occurred in 2016. As shown, the largest number of responses at all three fire stations is for EMS.

**TABLE IV.K.1-2  
FIRE AND PARAMEDIC INCIDENT DATA (ANNUAL)<sup>a</sup>**

<b>Station No. and Location</b>	<b>EMS Incident Responses</b>	<b>Non-EMS (Fire Incident) Responses</b>	<b>Total</b>
Fire Station 82 5769 Hollywood Boulevard Los Angeles	3,632	901	4,533
Fire Station 27 1327 North Cole Avenue Los Angeles	6,590	1,334	7,924
Fire Station 41 1439 North Gardner Street Los Angeles	3,986	1,024	5,010

NOTE:

<sup>a</sup> Data available from January 2016 through December 2016 (the latest whole year for which fire response times were available).

SOURCE: Los Angeles Fire Department, FireStatLA website, <http://www.lafd.org/fsla/stations-map>, accessed July 2017.

As shown in Table IV.K.1-2, the number of respective yearly incidences among the three fire stations in the vicinity of the Project Site in 2016 was 4,533 responses for Fire Station 82, 7,924 responses for Fire Station 27; and 5,010 responses for Fire Station 41.

*(a) Recent Changes in the Delivery of Services by the LAFD*

In January 2015, the LAFD implemented a significant organizational change, when it divided the Department into the four above-mentioned geographic bureaus aligned with the boundaries of the Los Angeles Police Department's (LAPD) geographic bureaus. This new structure was developed to unify efforts among the LAFD, LAPD and the Emergency Management Department to make City service providers more responsive and resilient in an emergency. The LAFD also recently implemented a new emergency medical dispatch card system (Tiered Dispatch System) to reduce call processing times.<sup>22</sup> That reduction minimizes the amount of time a resident is on the phone reporting an emergency. Additionally, the LAFD's Automatic Vehicle Location, used in combination

<sup>22</sup> LAFD Website, available at: <http://www.lafd.org/news/lafd-implements-new-bureau-command-structure>. Accessed July 29, 2019.

with GPS devices, helps to ensure the closest possible emergency resource is dispatched. As part of LAFD's 2015-2017 Strategic Plan, "A Safer City," LAFD launched FireStatLA in 2014, which involves a regular evaluation of leadership and management that is designed to quantify and evaluate the performance of the LAFD's fire and emergency medical services units at the Station, Battalion, Bureau and Department level.<sup>23</sup>

## (2) Emergency Access

As shown on Figure IV.K.1-1, the Project Site is accessible by emergency vehicles from a number of major roadways (i.e., Hollywood Boulevard, Vine Street) serving the Project Site. Emergency access to the Project Site is provided directly via West Yucca Street and Argyle Avenue. Fire Station 82 has access to the Project Site from the east via Hollywood Boulevard to Gower Street to West Yucca Street, or from Hollywood Boulevard to Argyle Avenue. Fire Station 27 has access to the site from the southwest via Vine Street to West Yucca Street. Fire Station 41 has access to the site from the southwest via West Sunset Boulevard to Vine Street to West Yucca Street.

As further discussed below, according to, LAMC Section 57.507.2.3, the maximum response distance from a high-density residential and commercial development to a fire station is 1.5 miles for an engine company and 2 miles from a truck company. As shown on Table IV.K.1-1, Fire Station 82 and 27, at distances of .50 miles and .60 miles from the Project Site, respectively, are within and meet the distance standards of 1.5 miles for an engine company and two miles for a truck company.

## (3) Water Infrastructure/Fire Flow for Firefighting Services

The existing water infrastructure serving the Project Site consists of water mains located in adjacent City streets. The local distribution network varies from four-inch to 12-inch pipe diameters and includes a 12-inch pipe beneath West Yucca Street; an eight-inch pipe beneath Argyle Avenue; and a four-inch pipe beneath Vista Del Mar Avenue.<sup>24</sup>

Water for firefighting purposes is supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP).<sup>25</sup> 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

<sup>23</sup> LAFD "A Safer City" Strategic Plan, 2016-2017, <https://issuu.com/lafd/docs/262609736-lafd-strategic-plan-2015-?e=17034503/13744980>.

<sup>24</sup> Water System and Supply Report for the 6220 West Yucca, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. (Appendix N to this Draft EIR)

<sup>25</sup> See Section IV.N, Utilities, of this Draft EIR.

gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds psi.<sup>26</sup>

The existing multi-family apartment units on the Project Site do not have a fire sprinkler system installed due to the age of the buildings. The existing residential uses are protected by three public fire hydrants along the streets adjacent to the site, with three additional fire hydrants located in the nearby vicinity. For the locations of the fire hydrants, please refer to Appendix II, Existing and Proposed Water System Map, of the Water System and Supply Report, provided in Appendix N, of this Draft EIR.<sup>27</sup>

### 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 fire protection services if it would:

***Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.***

In assessing the Project's potential impacts related to fire protection services in this section, the City has determined to use Appendix G to the State CEQA Guidelines as its thresholds of significance. The factor below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G question. The factors to evaluate fire protection services impacts include:

- A project would normally have a significant impact on fire protection and emergency medical services if it requires the addition of a new fire station, or the expansion, consolidations or relocation of an existing facility to maintain service.

#### b) Methodology

Fire protection and emergency medical service 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. Project impacts regarding fire services are evaluated in consultation with LAFD, which reviews, on a project-by-project basis, each proposed project's land use type, fire-related needs, whether the project site meets

<sup>26</sup> LAMC, Article 7, Section 57.503, Fire Flow, Table 57.507.3.1, Fire Flow by Type of Development. Available at: [http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles\\_ca\\_mc](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc). Accessed July 29, 2019.

<sup>27</sup> Ibid.

the recommended response distance and fire safety requirements, and project design features that would reduce or increase the demand for fire protection services. 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, response distance for engine and truck companies (the distance standard is 1.5 miles for an engine company and 2 miles from a truck company), fire hydrant sizing and placement standards, access, and the Project's potential to use or store hazardous materials.

The need for or deficiency in adequate fire protection and emergency medical services in and of itself is not an environmental impact under CEQA, but rather a social and/or economic impact.<sup>28</sup> If a project generates demand for additional fire protection and emergency medical services that results in the need to construct new facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact must be evaluated within the project EIR and if found to be significant, mitigated (if feasible). The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection and emergency medical services is determined by whether construction of new or expanded fire protection and emergency medical facilities would be needed. In the event that the City determines that expanded or new emergency facilities are warranted, 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 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.

The Project's potential impacts related to the potential use and storage of hazardous materials were evaluated in the Initial Study prepared for the Project, and are included in Appendix A of this Draft EIR. Based on this evaluation, impacts associated with use and storage of hazardous materials were determined to be less than significant and therefore this issue is not evaluated in a separate section in this Draft EIR, but is discussed in Chapter V, subsection 6, *Impacts Determined to be Less than Significant*.

### **c) Project Design Features**

The following Project Design Features are incorporated into the Project to provide additional safety protection and reduce potential service demand impacts on the LAFD.

**PDF-FIRE-1:** The following Voluntary Fire and Emergency Medical Measures will be provided for the long term operations of the Project:

- Owner supplied automated external defibrillators (AED's) will be provided on selected floors to be used by on-site security as necessary. Security personnel will be fully trained on the use and operation of the AED's; and

<sup>28</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843

- First aid training will be made available and encouraged for all building occupants, accessible on-line.

**PDF-TRAF-1:** The Construction Traffic Management Plan, described in Section IV.L, *Transportation*, relates to maintaining adequate response times associated with fire protection and emergency medical services.

## d) Analysis of 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 fire protection?***

### (1) Construction

Construction activities associated with the demolition of the existing on-site structures and the construction of the Project could potentially temporarily increase the demand for fire protection and emergency medical services through the occasional 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 Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, Project construction managers and personnel will be trained in fire prevention and emergency response, and fire suppression equipment specific to construction vehicles will be maintained on-site. Additionally, Project construction will 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. Therefore, due to compliance with applicable requirements, codes and ordinances, the Project's construction impacts on fire protection and emergency medical services would be less than significant.

Construction staging, including material stockpiling and equipment storage, would occur within the Project Site boundaries or within adjacent street parking lanes along the Project Site frontages on West Yucca Street and Argyle Avenue. Notwithstanding, construction-related traffic on adjacent streets could potentially affect emergency response and emergency access to the Project Site and neighboring uses. For example, construction activities may involve temporary lane closures for utility construction or construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. However, the impacts of such construction activity would be temporary and intermittent. Further, truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City of Los Angeles Board of Building and Safety

Commission prior to construction activities, and these routes would be set so as to create minimal traffic and access-related effects.

As discussed in Section IV.L, *Transportation*, of this Draft EIR, per PDF-TRAF-1 a Construction Management Plan would be prepared in order to minimize these types of disruptions to through-traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker trips and construction equipment delivery to avoid peak traffic hours. As a component of the Construction Management Plan, the times of day and locations of all temporary lane closures would be coordinated so that they would not occur during peak periods of traffic congestion, to the extent feasible, and haul trucks and other vehicles would be coordinated to minimize queuing on adjacent streets. In the event of a lane or sidewalk closure, a worksite traffic control plan would be implemented to route traffic or pedestrians around any such lane or sidewalk closures. The Construction Management Plan would be prepared for review and approval by LADOT prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response during construction of the Project.

Moreover, as demonstrated in Table IV.K.2-1 on page IV.K.1-13, Fire Station 82, 27, and 41 are located approximately 0.50 miles, 0.60 miles, and 1.65 miles, respectively, from the Project Site. Fire Stations 82 and 27, at 0.50 miles and 0.60 miles from the Project Site, are within and meet the distance standards of 1.5 miles for an engine company and two miles for a truck company.

The impacts of the Project's construction activities would be of short duration, and intermittent. Further, construction of the Project would comply with OSHA and 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.

**Therefore, Project construction would not result in the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. The Project's impacts on fire protection and emergency medical services during construction would be less than significant.**

## (2) Operation

### (a) *Fire Protection, Facilities, and Emergency Services*

The Project would introduce additional residents, workers, and visitors to the Project Site that would increase the demand for fire protection services and emergency medical services. The adequacy of fire protection and emergency medical services for a given area is based on response distance from existing fire stations, required fire-flow, and the LAFD's assessment of station capacity to respond to incidents in the area.

As previously discussed, Fire Station 82 is located nearest the Project Site and would be first due station to respond to an emergency. Additional back up response is provided by Fire Stations 27 and 41. As indicated in Table IV.K.1-1, Fire Stations 82, 27, and 41 are located approximately 0.50 miles, 0.60 miles, and 1.65 miles, respectively, from the Project Site. Fire Stations 82 and 27 meet the distance standards of 1.5 miles for an engine company and two miles for a truck company. Fire Stations 82 and 27 have average EMS incident response times of 6:11 minutes and 6:23 minutes, respectively. Fire Stations 82 and 27 have average Non-EMS response times of 6:31 minutes and 5:40 minutes, respectively. As discussed above, it should be noted that the operational average response times are not necessarily representative of the actual time required to reach the Project Site from any of these fire stations, but is simply an indication of the average time needed to reach any given destination within each station's respective service area. Actual response time to a given site would depend on individual factors such as distance between a fire station and a site, and roadway characteristics as well as topography (i.e., a response time would be greater for hillside areas with narrow roadways). Fire Station 82 serves residential areas located to the north in the topographically diverse Hollywood Hills located approximately two miles north of the Project Site. As Fire Station 82 is located only approximately 0.50 miles from the Project Site, which is located in a generally flat area, it is reasonable to expect that responses to emergency calls to the Project Site could be made in less than the average EMS and Non-EMS response times.

The Project would comply with all applicable provisions of the Fire Code. Its construction would comply with requirements of the Fire Code, Building Code, and LAFD that address structure design and building materials. The Project would rise to a maximum building height of 255 feet, and thus must comply with LAMC Sections 57.402 through 57.409.11 as required in Section 57.409, Emergency Planning and Evacuation Requirements for High-Rise Buildings, and Section 57.409.1, Requirements for High-Rise Buildings. The Project's design would include fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements. The Project's fire safety features would include the installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system. The Project would include the implementation of an Emergency Plan in accordance with LAMC Section 57.409, Emergency Planning and Evacuation Requirements for High-Rise Buildings. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g. floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts related to an increased need for emergency medical services. The Project would provide access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and

on-site vehicle restrictions to ensure safe access. All water systems and driveways would be completed to the satisfaction of the Fire Department prior to the issuance of building permits. LAFD approval of plot plans showing fire hydrants and access for each phase of the Project would be required prior to the recording of the final map. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the Project.

The Project-related increase in traffic on surrounding roadways could potentially affect emergency response in the area. However, a number of factors would operate to facilitate responses to emergency calls so as to reduce any potential impact. Emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternate routes, and multiple station response. The Project Site vicinity is well served by two nearby fire stations within close proximity to one-another and the Project Site. These fire stations have access to multiple routes to respond to emergency calls. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles will have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site. The Project will be required to provide adequate access for emergency vehicles to the Project Site, subject to the approval of the LAFD. As provided in PDF-FIRE-1, voluntary fire and emergency medical measures (i.e., inclusion of AED's and appropriate training, first aid and training) are incorporated into the long term operations of the Project, and would reduce the Project's need for fire and emergency medical services.

There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. The LAFD has recently taken a number of steps to improve its related systems, processes and practices and lower its response times. Upgrades 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; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of Citywide traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. Based on the ability of LAFD to respond to emergency situations, the number, proximity, and accessibility of fire stations in the Project vicinity and the multiple steps being taken by the LAFD to improve emergency response, Project impacts on fire protection, services, and emergency response are considered less than significant.

With compliance with all applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access, construction measures, water system improvements, and plot plan review) and PDF-FIRE-1, along with the fact



that LAFD has no known or proposed plans to expand their Hollywood facilities,<sup>29</sup> the Project is not expected to result in a substantial increase in demand for additional fire protection and emergency medical services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities. Even if the LAFD had determined that the Project created the need for a new fire station, or the expansion, consolidation, or relocation of an existing station, which was foreseeable, the impacts associated with the construction and operation of such a station would be analyzed at that time under CEQA as a project independent of the Project. Moreover, the Hollywood community is highly developed, and the construction of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size. Generally, development associated with typical fire stations is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are anticipated to be addressed pursuant to CEQA through categorical infill exemptions (CEQA Guidelines 15332) or (mitigated) negative declarations since they are likely relatively small structures on infill parcels. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact of the Project or one that the Project is required to mitigate, and is speculative.<sup>30</sup> Further, consistent with *the City of Hayward v. Trustees of California State University*,<sup>31</sup> significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate.

Moreover, the Project would generate revenue (e.g., property and sales tax revenue) for the City's general fund that could be used to fund LAFD expenditures as necessary to offset any incremental Project impact on fire protection. 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, which are typically financed through the City's general funds.

Based on the above, potential impacts on fire protection and emergency medical services would be less than significant.

#### (b) Emergency Access

Emergency access to the Project Site would continue to be provided via West Yucca Street and Argyle Avenue. Also, the Project would have an approved EHLF on the roof adjacent to or above the highest habitable level in accordance with LAMC Section 57.4705.4 or would provide specific life safety features as outlined in LAFD Requirement No. 10, if an EHLF is not provided. The Project would comply with all applicable ELHF and LAFD Requirement No. 10 requirements, which would minimize its potential emergency access

<sup>29</sup> Per correspondence with the LAFD, no planned improvements are known or proposed to fire protection facilities in the service area of the project. (Appendix K to this Draft EIR)

<sup>30</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843.

<sup>31</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843.

impacts. The Project would be subject to the review and approval of the LAFD for compliance with emergency access requirements prior to issuance of building permits. Therefore, with the Project's compliance with the applicable provisions of the Fire Code, the Project's impacts regarding emergency access would be less than significant.

(c) *Water Infrastructure/Fire Flow for Firefighting Services*

As described in the Existing Conditions section above, existing water infrastructure serving the Project Site consists of water mains located on the adjacent City streets. The local distribution network varies from four-inch to 12-inch pipe diameters and includes a 12-inch pipe beneath West Yucca Street; an eight-inch pipe beneath Argyle Avenue; and a four-inch pipe beneath Vista Del Mar Avenue. There are six public fire hydrants located within the vicinity of the Project Site. Per discussion with Fire Inspector Robert Duff of the LAFD, there are adequate public fire hydrants within the Project vicinity that are connected to the Citywide water system and there are no additional fire flow requirements necessary for the site including no additional private fire hydrants required.<sup>32</sup> The LAFD has determined that the available fire flow for the Project would be 9,000 gpm at 20 psi from the six fire hydrants flowing simultaneously. This would therefore meet LAFD fire hydrant flow requirements, which require four to six hydrants flowing 6,000 to 9,000 gpm as stated in Chapter 5, Article 7, of the LAFD Fire Code, Sec. 57.507.3, Table 57.507.3.1.<sup>33</sup> Further, fire flow would be in compliance with the requirements of Section 57.507.3, Fire Flow, of the Fire Code and be subject to the review and approval of the LAFD. According to the Project's LADWP Fire Service Pressure Flow Report (SAR - see Appendix III of the Water System and Supply Report), the existing Project Site would have a fire flow of 1,400 gpm, with a simultaneous 700 gpm domestic flow (a total of 2,100 gpm). The Project design would require 1,000 gpm fire flow with a maximum simultaneous 862 gpm domestic flow (for a total of 1,862 gpm). As such, the existing system has sufficient capacity for the Project's fire sprinkler needs.<sup>34</sup> As the Project would be designed in compliance with applicable regulatory requirements of the Fire Code and subject to review and approval by the LAFD, Project impacts with respects to fire flow requirements would be less than significant.

**Therefore, Project operation would not result in the need for new or physically altered fire facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios, response times or objectives. The Project's impacts on fire protection and emergency medical services during operation would be less than significant, and no mitigation is required.**

<sup>32</sup> Water System and Supply Report for the 6220 West Yucca, page 15, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. (Appendix N to this Draft EIR)

<sup>33</sup> Water System and Supply Report for the 6220 West Yucca, page 15, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. See Appendix V of Water System and Supply Report (Appendix N to this Draft EIR)

<sup>34</sup> Water System and Supply Report for the 6220 West Yucca, page 15, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. (Appendix N to this Draft EIR)

## e) Cumulative Impacts

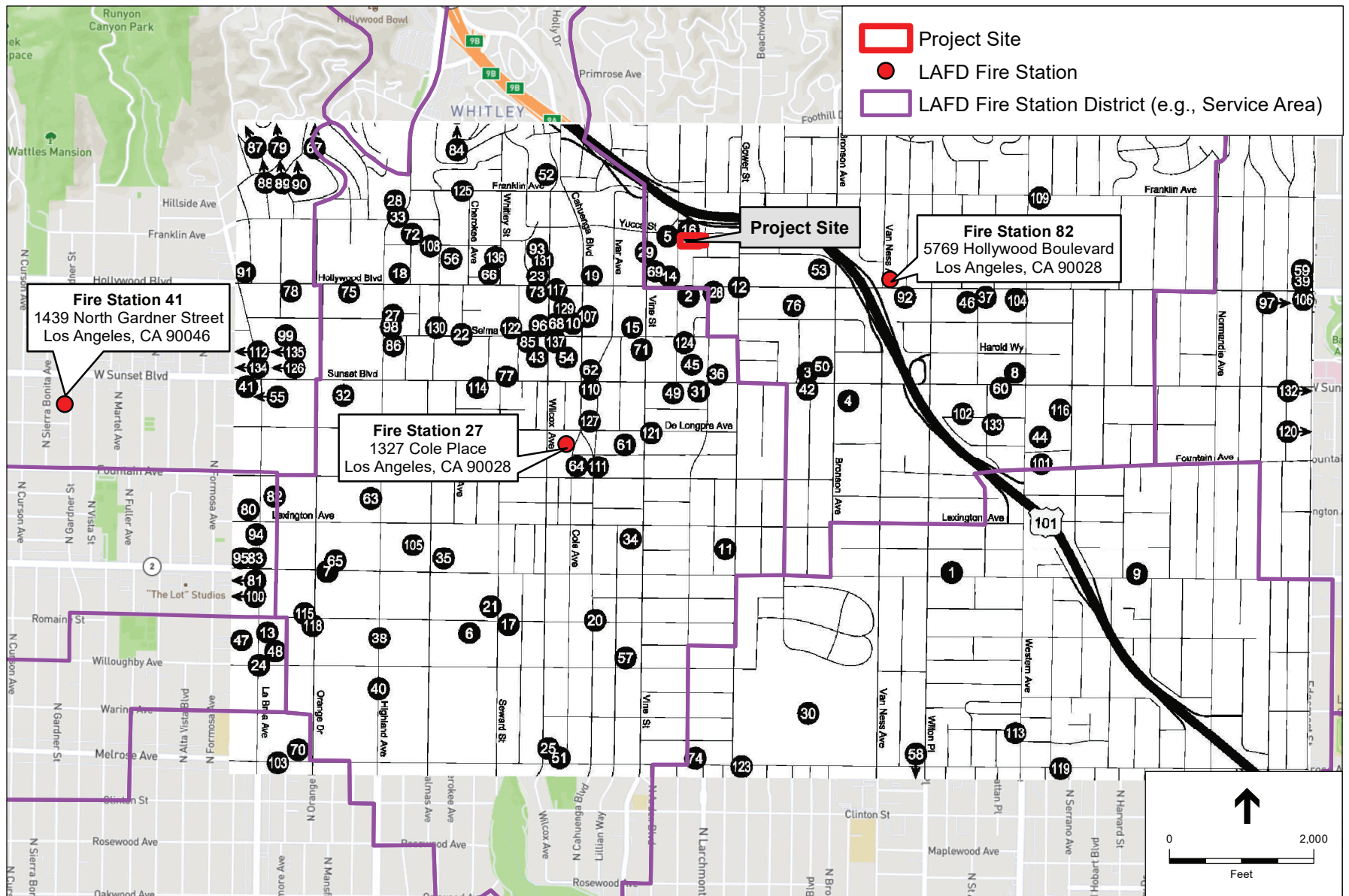
Chapter III, *General Description of Environmental Setting*, of this Draft EIR, identifies 137 related projects that are anticipated to be developed in the Project Site vicinity within the City of Los Angeles and, therefore, within the service areas of the LAFD. Of these, 99 are located within the fire station service areas of the same three LAFD Fire Stations that would serve the Project (e.g., Fire Stations 82, 27, and 41) as shown in **Table IV.K.1-3, Related Projects within the LAFD Service Areas**. As shown in Table IV.K.1-3, six of the 99 related projects (Related Project Nos. 3, 4, 42, 50, 53, and 92) are primarily served by Fire Station 82, which is the first due fire station serving the Project Site, and the most affected by the Project in conjunction with related projects. These related projects, during both construction and operation, would cumulatively generate the need for additional fire protection and emergency medical services from the LAFD in conjunction with the Project.

**Figure IV.K.1-2, Fire Station Boundaries and Related Projects**, illustrates the service boundaries of Fire Stations 82, 27, and 41 and the location of the related projects within these boundaries.

### (1) Construction

Like 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, like the Project each related project would be required to comply with OSHA and Fire and Building Code requirements. 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 all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Due to their close proximity to the Project Site, should Project construction occur concurrently with the construction of Related Projects No. 5 and 16, specific coordination among these construction sites would be required by the City and implemented through the Project's Construction Management Plan per PDF-TRAF-1, which would ensure that emergency access and traffic flow are maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project and the related projects would not significantly impact LAFD response within the Project Site vicinity as 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.



SOURCE: Open Street Map 2017; City of Los Angeles Open Data:  
<https://data.lacity.org/>; ccessed January 2017; ESA, 2017.

6220 West Yucca Project  
**Figure IV.K.1-2**  
 Fire Station Boundaries and Related Projects

**TABLE IV.K.1-3  
RELATED PROJECTS WITHIN THE LAFD SERVICE AREA**

<b>No.</b>	<b>Project Description</b>	<b>Address</b>	<b>Primary Fire Station</b>
1	Paseo Plaza Mixed-Use	5651 W. Santa Monica Boulevard	Outside
2	El Centro (formerly Boulevard 6200 Mixed-Use)	6200 W. Hollywood Boulevard	27
3	Mixed-Use	5939 W. Sunset Boulevard	82
4	Sunset Bronson Studio	5800 W. Sunset Boulevard	82
5	Argyle House (formerly Yucca Street Condos)	6230 W. Yucca Street	27
6	Hollywood 959	959 N. Seward Street	27
7	Archstone Hollywood Mixed-Use Project	6911 W. Santa Monica Boulevard	41
8	SunWest Project (Mixed-Use)	5525 W. Sunset Boulevard	Outside
9	Mixed-Use	5245 W. Santa Monica Boulevard	Outside
10	Selma Hotel	6417 W. Selma Avenue	27
11	Hollywood Production Center	1149 N. Gower Street	Outside
12	Hollywood Gower Mixed-Use	6100 W. Hollywood Boulevard	27
13	Mixed-Use Office/Retail	936 N. La Brea Avenue	41
14	Pantages Theater Office	6225 W. Hollywood Boulevard	27
15	Selma & Vine Office Project	1601 N. Vine Street	27
16	Kimpton Everly Hotel (formerly Argyle Hotel Project)	1800 N. Argyle Avenue	27
17	Seward Street Office Project	956 N. Seward Avenue	27
18	Restaurant	6757 W. Hollywood Boulevard	27
19	Hotel & Restaurant Project	6381 W. Hollywood Boulevard	27
20	Television Center (TVC Expansion)	6300 W. Romaine Street	27
21	Hollywood Center Studios Office	6601 W. Romaine Street	27
22	Selma Community Housing	1603 N. Cherokee Avenue	27
23	Hudson Building	6524 W. Hollywood Boulevard	27
24	La Brea Gateway	915 N. La Brea Avenue	41
25	Residential	712 N. Wilcox Avenue	27
26	Restaurant & Deli	5500 W. Hollywood Boulevard	Outside
27	Mixed-Use	1610 N. Highland Avenue	27
28	Highland Avenue Indigo Hotel Project	1841 N. Highland Avenue	27

<b>No.</b>	<b>Project Description</b>	<b>Address</b>	<b>Primary Fire Station</b>
29	Millennium Hollywood Mixed-Use Project (current Project on this site is the Hollywood Center Project) <sup>35</sup>	1740 N. Vine Street	27
30	Paramount Pictures	5555 W. Melrose Avenue	Outside
31	6200 W Sunset Boulevard	6200 W. Sunset Boulevard	27
32	Apartments	1411 N. Highland Avenue	27
33	Apartment Project	1824 N. Highland Avenue	27
34	Hotel	1133 N. Vine Street	Outside
35	The Lexington Mixed-Use	6677 W. Santa Monica Boulevard	27
36	Columbia Square Mixed-Use	6121 W. Sunset Boulevard	27
37	Mixed-Use (High Line West)	5550 W. Hollywood Boulevard	Outside
38	Tutoring Center	927 N. Highland Avenue	27
39	Kaiser Permanente Medical Office	4905 W. Hollywood Boulevard	Outside
40	Starbucks w/ Drive-Thru	859 N. Highland Avenue	27
41	Mixed-Use	7120 W. Sunset Boulevard	41
42	Sunset & Gordon Mixed Use	5935 W. Sunset Boulevard	82
43	Sunset + Wilcox	1541 N. Wilcox Avenue	27
44	Mixed-Use	1350 N. Western Avenue	Outside
45	Palladium Residences	6201 W. Sunset Boulevard	27
46	5600 W. Hollywood Boulevard	5600 W. Hollywood Boulevard	Outside
47	925 La Brea Avenue	925 La Brea Avenue	41
48	904 La Brea Avenue	904 La Brea Avenue	41
49	6250 Sunset (Nickelodeon)	6250 W. Sunset Boulevard	27
50	Mixed-Use	5901 Sunset Boulevard	82
51	2014 Residential	707 N. Cole Avenue	27
52	Hotel	1921 Wilcox Avenue	Outside
53	1717 Bronson Avenue	1717 N. Bronson Avenue	82
54	Cahuenga Boulevard Hotel	1525 N. Cahuenga Boulevard	27
55	Sunset Mixed-Use	7500-7510 W. Sunset Boulevard	41
56	Las Palmas Residential (Hollywood Cherokee)	1718 N. Las Palmas Avenue	27
57	Mixed-Use	901 N. Vine Street	Outside
58	Apartments	525 N. Wilton Place	Outside

<sup>35</sup> See Chapter III of this Draft EIR for additional details on the Hollywood Center Project.

<b>No.</b>	<b>Project Description</b>	<b>Address</b>	<b>Primary Fire Station</b>
59	Hardware Store	4905 W. Hollywood Boulevard	Outside
60	Target Retail Shopping Center Project	5520 W. Sunset Boulevard	Outside
61	Academy Square	1341 Vine Street	27
62	Ivy Gardens Hotel	6409 W. Sunset Boulevard	27
63	Mixed-Use	1233 N. Highland Avenue	27
64	Mixed-Use	1310 N. Cole Avenue	27
65	Mixed-Use at 6901 Santa Monica Boulevard	6901 Santa Monica Boulevard	41
66	Hyatt House Hotel & Retail	6611 W. Hollywood Boulevard	27
67	Apartments	2864 N. Cahuenga Boulevard	Outside
68	TAO Restaurant	6421 W. Selma Avenue	27
69	citizenM Hotel	1718 Vine Street	27
70	Mixed-Use	6915 Melrose Avenue	41
71	Sunset & Vine Mixed-Use	1528 N. Vine Street	27
72	Apartments & Retail	6758 W. Yucca Street	27
73	Restaurant & Multi-Purpose Entertainment Venue	6506 W. Hollywood Boulevard	27
74	Condos & Retail	5663 Melrose Avenue	Outside
75	Retail & Office Building	6904 W. Hollywood Boulevard	41
76	Residential Development	6001 W. Carlton Way	27
77	Hotel	6600 W. Sunset Boulevard	27
78	Apartments	7046 W. Hollywood Boulevard	41
79	Hollywood Central Park	Hollywood Freeway (US 101)	Outside
80	Apartment & Retail	1201 N. La Brea Avenue	41
81	Movietown	7302 W. Santa Monica Boulevard	41
82	Mixed-Use	1222 N. La Brea Avenue	41
83	Mixed-Use	7113 W. Santa Monica Boulevard	41
84	John Anson Ford Theater	2580 Cahuenga Boulevard East	Outside
85	Hotel	6500 Selma Avenue	27
86	Hollywood Crossroads	1540-1552 Highland Avenue & others	27
87	Gas Station & Convenience Store	3704 N. Cahuenga Boulevard	Outside
88	Mixed-Use	3400 N. Cahuenga Boulevard	Outside
89	Condominium	3450 N. Cahuenga Boulevard	Outside

<b>No.</b>	<b>Project Description</b>	<b>Address</b>	<b>Primary Fire Station</b>
90	NBC Universal Evolution Plan	100 Universal City Plaza	Outside
91	Mixed-Use	7107 Hollywood Boulevard	41
92	5750 Hollywood	5750 Hollywood Boulevard	82
93	Wilcox Hotel	1717 Wilcox Avenue	27
94	Apartments and Office	1145 La Brea Avenue	41
95	Faith Plating	7143 Santa Monica Boulevard	41
96	Selma Hotel	6516 W. Selma Avenue	27
97	Select @ Los Feliz (Mixed-Use)	4850 W Hollywood Boulevard	56
98	Highland Center Mixed-Use Project	1600 N Highland Avenue	27
99	Lanewood Apartments	7045 W Lanewood Avenue	41
100	Mixed-Use	1041 Formosa Avenue	41
101	Apartments	5460 W Fountain Avenue	56
102	Hollywood De Longpre Apartments	5632 De Longpre Avenue	56
103	Melrose Crossing Mixed-Use	7000 Melrose Avenue	41
104	Mixed-Use	1657 N Western Avenue	56
105	McCadden Campus (LGBT)	1118 N McCadden Place	27
106	4900 Hollywood Mixed-Use	4900 W Hollywood Boulevard	56
107	Restaurant Expansion	1615 N Cahuenga Boulevard	27
108	Apartments	1749 Las Palmas Avenue	27
109	Mixed-Use	1868 N Western Avenue	56
110	6400 Sunset Mixed-Use	6400 Sunset Boulevard	27
111	Mixed-Use	1311 Cahuenga Boulevard	27
112	Gelson's Supermarket	1502 N Gardner Street	41
113	747 N Western Avenue	747 N Western Avenue	52
114	6630 W Sunset Boulevard	6630 W Sunset Boulevard	27
115	1001 N Orange Drive	1001 N Orange Drive	41
116	Sunset & Western	5420 W Sunset Boulevard	56
117	Hollywood & Wilcox	6430-6440 W Hollywood Boulevard	27
118	7007 W Romaine Street Office and Retail	7007 W Romaine Street	41
119	Mixed-Use	4914 W Melrose Avenue	52
120	Hospital Seismic Retrofit	1300 N Vermont Avenue	56
121	Onni Group Mixed-Use Development	1360 N Vine Street	27
122	1600 Schrader	1600 Schrader Boulevard	27
123	Melrose & Beachwood	5570 W Melrose Avenue	52



No.	Project Description	Address	Primary Fire Station
124	Modera Argyle	1546 N Argyle Avenue	27
125	Montecito Senior Housing	6650 W Franklin Avenue	27
126	The Chaplin Hotel Project	7219 W Sunset Boulevard	41
127	Godfrey Hotel	1400 N Cahuenga Boulevard	27
128	6140 Hollywood	6140 Hollywood Boulevard	27
129	Selma - Wilcox Hotel	6421 W Selma Avenue	27
130	Apartments	1601 N Las Palmas Avenue	27
131	1723 N Wilcox Residential	1723 N Wilcox Avenue	27
132	Kaiser Permanente Medical Center Hollywood	4760 Sunset Boulevard	56
133	Mixed-Use	1370 N St Andrews Place	56
134	7445 Sunset Grocery	7445 W Sunset Boulevard	41
135	7225 Sunset Mixed-Use	7225 W Sunset Boulevard	41
136	1719 Whitley Hotel	1719 N Whitley Avenue	27
137	1550 Wilcox Office	1550 Wilcox Avenue	27

## NOTES:

Please refer to Figure III-1, Related Projects Map, in Chapter III, *General Description of Environmental Setting*, of this Draft EIR for the location of the related projects.

"Outside" refers to the related project's primary fire station service area outside of Fire Stations 82, 27, and 41.

SOURCE: City of Los Angeles Fire Department Website, Find Your Station, [http://www.lafd.org/fire\\_stations/find\\_your\\_station](http://www.lafd.org/fire_stations/find_your_station), accessed November 2017.

For the reasons discussed above, the Project would not cause a significant Project-level impact to fire services during construction. **Therefore, the Project's contribution to cumulative impacts on either fire protection services or emergency response during construction would not be cumulatively considerable, and cumulative impacts would be less than significant, and no mitigation is required.**

## (2) Operation

During the operations phase, although the cumulative demand on LAFD services would increase, cumulative impacts on fire protection and emergency medical services would be less than significant as a result of each related Project's regulatory compliance and site-specific design and safety features, similar to the Project. All related projects are located in a developed, urbanized area. Because of the numerous fire stations serving the broader Project Study area and the area in the vicinity of the Project Site, all related projects would be served by the LAFD. Each related project would be subject to the required review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services. Project-by-project

traffic mitigation, multiple fire station response, and system-wide upgrades to improve emergency response, and other requirements imposed by the LAFD, are expected to help support adequate emergency response. Each related project and other future development projects in the Hollywood Community Plan area would be required to comply with regulatory requirements related to fire protection and emergency medical services. As discussed above, any project that exceeds the maximum applicable LAMC response distance standards would be required to install automatic fire sprinkler systems in order to compensate for the additional response distance. In addition, the Project, related projects, and other future development projects in the Hollywood Community Plan area would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As discussed above for the Project, LAFD has no known or proposed plans to expand its Hollywood fire facilities even in consideration of the related projects. If a new fire station, or the expansion, consolidation, or relocation of a station were at some later date determined to be warranted by LAFD, the impacts of the construction and operation of such a station would be analyzed at that time under CEQA as a project independent of the proposed Project. Moreover, the Hollywood community is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Generally, development associated with typical fire stations is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are anticipated to be addressed pursuant to CEQA through categorical infill exemptions (CEQA Guidelines 15332) or (mitigated) negative declarations since they would likely be relatively small structures on infill parcels. Accordingly, the need for additional fire protection and emergency medical services as part of an unplanned or expanded fire station at this time is not an environmental impact of the Project or one that the Project is required to mitigate, and is speculative.<sup>36</sup>

Moreover, similar to the Project, the related projects would generate revenue (e.g., property and sales tax revenue) for the City's general fund that could be used to fund LAFD expenditures as necessary to offset any cumulative incremental impact from the related projects on fire protection. 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, which are typically financed through the City general funds. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would be identified through this process, the impacts of which would be addressed accordingly.

<sup>36</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833.

With regard to emergency response, the Project and related projects could introduce new uses which would generate additional traffic in the vicinity of their sites. Traffic from the Project and related Projects could have the potential to affect emergency vehicle response to the affected areas due to travel time delays caused by the additional traffic. However, as is the case under existing conditions, emergency vehicles would access the Project Site and each of the related projects directly from the surrounding roadways. The drivers of 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 of opposing traffic. As such, emergency access would be maintained at all times, and the increase in cumulative traffic generated by the Project and related projects would not significantly impact emergency vehicle response to the affected areas. In addition, when applicable, the related project would comply with all applicable EHLF and LAFD requirement No. 10 requirements, which would minimize their potential emergency access impacts. All related projects would be subject to the review and approval of the LAFD for compliance with emergency access requirements prior to issuance of building permits. Finally, consistent with the *City of Hayward v. Trustees of California State University*,<sup>37</sup> significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate.

The related projects study area is located within the City of Los Angeles and is served by LADWP in-street water services. Related projects would incorporate features to achieve adequate fire flow. No additional development would be permitted by the City in an area where fire flow would not be adequate to meet Fire Code standards.

**Based on the above considerations, the Project's contribution to cumulative impacts to fire protection and emergency services, emergency access and water infrastructure/fire flow during operation would not be cumulatively considerable. As such, cumulative impacts on fire protection during Project operation would be less than significant, and no mitigation is required.**

## **f) Mitigation Measures**

Project impacts regarding fire protection would be less than significant. Therefore, no mitigation measures are required.

## **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant without mitigation.

<sup>37</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833.

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## **IV. Environmental Impact Analysis**

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### **K.2. Public Services – Police Protection**

#### **1. Introduction**

This section analyzes the Project's potential construction and operational environmental impacts related to police services provided by the City of Los Angeles Police Department (LAPD). The analysis addresses whether new or physically altered police facilities, the construction of which could cause significant environmental impacts, would be required to provide police protection services to the Project. The analysis is based, in part, on information provided by the LAPD.<sup>1</sup> This information includes statistical data regarding police protection facilities and services. This information provided by the LAPD is included in Appendix K, of this Draft EIR. Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data available on the LAPD website.<sup>2</sup>

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) County of Los Angeles**

###### **(a) Office of Emergency Management**

The County of Los Angeles (County) Office of Emergency Management, established by Chapter 2.68 of the 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 Office of Emergency Management's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.<sup>3</sup> The County organizes a formal mutual aid agreement among 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. Formal mutual aid requests between police departments can be made under the purview of the County Sheriff's Department; however, additional informal agreements may be made directly between the police agencies. The Mutual Aid Operations Plan provides a structure for response should an emergency arise which requires immediate response by

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<sup>1</sup> Officer Christopher Gibson, Community Relationship Division, LAPD, written correspondence, dated June 29, 2017 (Appendix K to this Draft EIR).

<sup>2</sup> Los Angeles Police Department. Website, <http://www.lapdonline.org/>, accessed July 31, 2019.

<sup>3</sup> County of Los Angeles Chief Executive Office, Office of Emergency Management, available at: <https://ceo.lacounty.gov/emergency-management>. Accessed July 31, 2019./.

a greater number of law enforcement personnel than would be available to LAPD using all other available resources.

## (2) City of Los Angeles

### (a) *Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element, 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 guide subsequent amendments of the City's Community Plans, Specific Plans, zoning ordinances, and other local planning programs, although it does not supersede the more detailed Community and Specific Plans.<sup>4</sup> As stated in the General Plan Framework Element, primary police law enforcement services are provided by the City of Los Angeles Police Department and supplemental services are provided by the Los Angeles County Sheriff, the California Highway Patrol, the Federal Bureau of Investigation, and the Drug Enforcement Administration. Chapter 9, Infrastructure and Public Services, sets forth specific police protection goals and objectives that are applicable to the Project, including:

**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.

**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.

**Policy 9.15.1:** Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations<sup>5</sup>

<sup>4</sup> City of Los Angeles General Plan, "Citywide General Plan Framework Element", (2001). <http://cityplanning.lacity.org/cwd/framwk/chapters/title.htm>, accessed July 31, 2019.

<sup>5</sup> City of Los Angeles General Plan, Citywide General Plan Framework Element, 1995, Chapter 9, Infrastructure and Public Services. Available at: <https://planning.lacity.org/cwd/framwk/chapters/09/09.htm>. Accessed July 31, 2019.

*(b) Hollywood Community Plan*

The 1988 Hollywood Community Plan includes a policy section regarding the provision of services. This Community Plan section includes 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 cited public facilities, 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.”<sup>6</sup>

*(c) Charter and Administrative and Municipal Codes*

The law enforcement regulations, powers, and duties of the LAPD are outlined in the City Charter, Administrative Code, and Los Angeles Municipal Code (LAMC). City Charter Article V, Departments, Section 570, Powers and Duties of the Department, gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and State and federal law. The Charter also gives the LAPD responsibility to act as peace officers and to protect lives and property in case of disaster or public calamity. Division 22, Departments, Bureaus and Agencies Under the Control of the Mayor and Council, Chapter 11, Police Department, Article 5, Training Activities, 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, Public Safety and Protection, 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 measures in regards to new development.

*(d) COMPSTAT Program*

In 1994, the LAPD incorporated the use of the COMPSTAT Program. The COMPSTAT Program implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This program 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.<sup>7</sup>

<sup>6</sup> Hollywood Community Plan, December 13, 1988, page HO-6. Available at: <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed July 31, 2019.

<sup>7</sup> Los Angeles Police Department, “COMPSTAT Plus;” [http://www.lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/6364](http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364), accessed July 31, 2019.

## b) Existing Conditions

Police protection services for Los Angeles, including the Project Site, are provided by the LAPD. LAPD's approximate 473-square-mile police service area has a population of approximately 3.9 million residents.<sup>8</sup> The LAPD consists of approximately 9,897 sworn officers.<sup>9</sup> The LAPD includes 21 community police areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. 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).<sup>10</sup>

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 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. 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.<sup>11,12</sup>

The Project Site is served by the Hollywood Community Police Station, located at 1358 North Wilcox Avenue, approximately 0.90 miles southwest of the Project Site, as shown in **Figure IV.K.2-1, Location of Hollywood Community Police Station**. The Hollywood Community Police Station's boundaries encompass 13.34 square miles and include 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.<sup>13</sup> The approximate borders of its service area are Mulholland Drive and Griffith Park boundary to the north, the city of Los Angeles boundary and Melrose Avenue to the south, Normandie Avenue and Griffith Park boundary to the east and the city of Los

<sup>8</sup> Los Angeles Police Department, COMPSTAT Citywide Profile, 12/04/16 – 12/31/16, <http://assets.lapdonline.org/assets/pdf/123116cityprof.pdf>, accessed July 2019.

<sup>9</sup> Ibid.

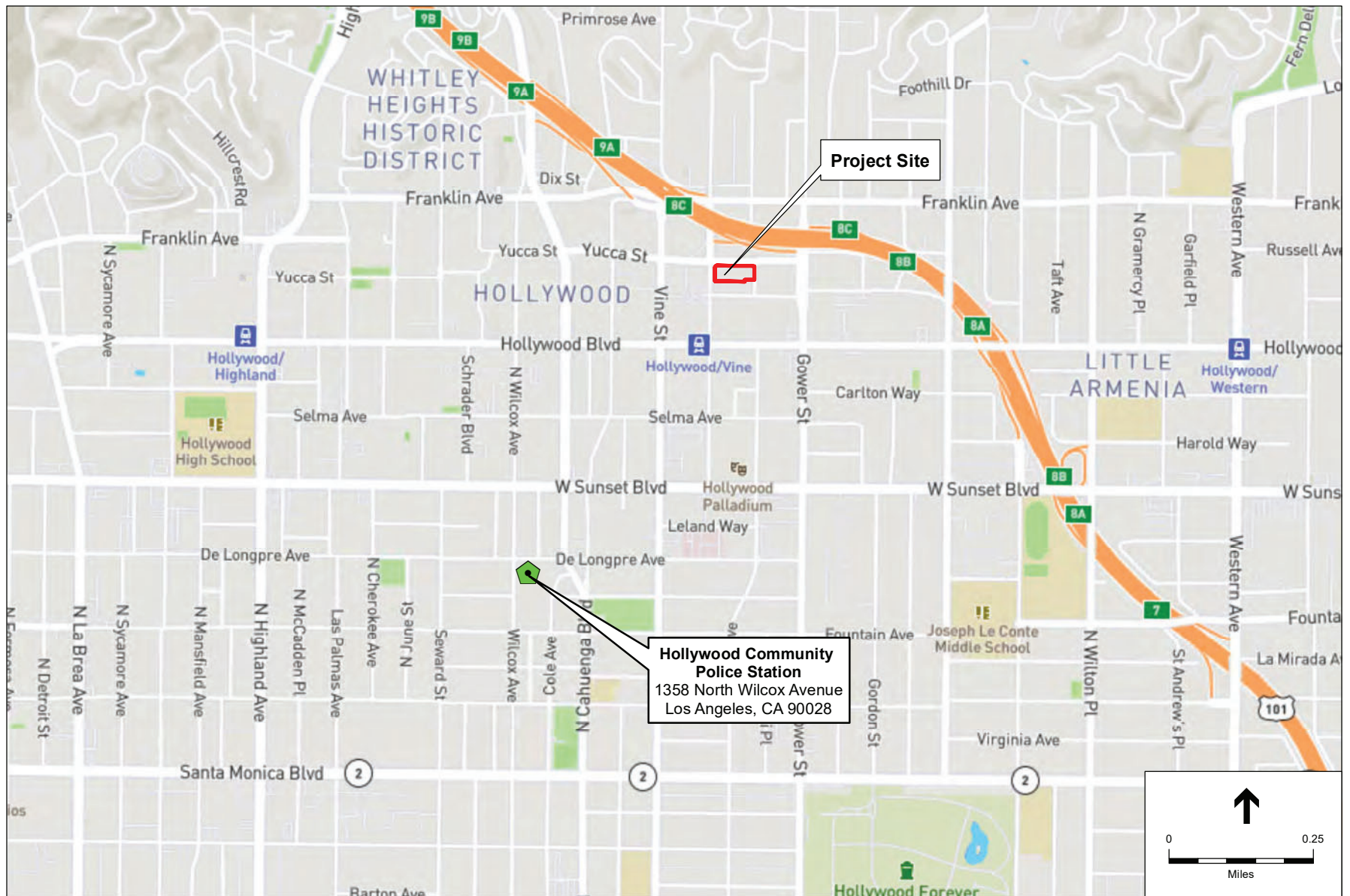
<sup>10</sup> Los Angeles Police Department. Website, Inside the LAPD, [http://www.lapdonline.org/inside\\_the\\_lapd](http://www.lapdonline.org/inside_the_lapd), accessed July 2019.

<sup>11</sup> The Los Angeles Police Department, COMPSTAT, Community Police Station Address Look Up, [http://lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/41960/West+Bureau/Hollywood/6A49/637/1432249208](http://lapdonline.org/inside_the_lapd/content_basic_view/41960/West+Bureau/Hollywood/6A49/637/1432249208), accessed July 31, 2019.

<sup>12</sup> The Los Angeles Police Department, West Bureau, [http://www.lapdonline.org/west\\_bureau/content\\_basic\\_view/1871](http://www.lapdonline.org/west_bureau/content_basic_view/1871), accessed July 31, 2019.

<sup>13</sup> The Los Angeles Police Department, Hollywood Community Police Station Website, [http://www.lapdonline.org/hollywood\\_community\\_police\\_station](http://www.lapdonline.org/hollywood_community_police_station), accessed July 31, 2019.





SOURCE: Open Street Map 2017.

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**Figure IV.K.2-1**

Location of Hollywood Community Police Station

Angeles boundary to the west.<sup>14</sup> Based on information provided by the LAPD, the Hollywood Community Police Station includes 352 sworn officers and 32 civilian support staff, who serve a population of approximately 165,000 residents.<sup>15</sup> The area served by the Hollywood Community Police Station is further divided into 35 reporting districts (RDs). The Project Site is served by RD 637. The boundaries of RD 637 are the Hollywood Freeway and Franklin Avenue to the north, Hollywood Boulevard to the south, the Hollywood Freeway to the east, and Vine Street to the west.<sup>16</sup> According to the LAPD, there are no current plans to expand the Hollywood Community Police Station.<sup>17</sup>

In the event a situation arises requiring increased staffing, additional officers can be called in from other LAPD area police stations. 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 emergency and/or conditions of extreme peril.

**Table IV.K.2-1, *Population, Officer, and Crime Comparison***, lists the resident population, number of sworn officers, officer/resident ratio, number of crimes, and crimes per 1,000 residents for the Hollywood Community Police Station and Citywide. As reported therein, the officer to resident population ratios within the Hollywood Community Area and Citywide are 1:468 and 1:397, respectively, and the number of crimes per 1,000 residents within the Hollywood Community Area and Citywide is 16 and 32, respectively.

As reported by the LAPD, as a whole, Citywide crime decreased steadily between 2003 and 2014.<sup>18</sup> 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.<sup>19</sup>

<sup>14</sup> Officer Christopher Gibson, Community Relationship Division, LAPD, written correspondence, dated June 29, 2017 (Appendix K to this Draft EIR).

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

<sup>17</sup> Per correspondence with the LAPD, LAPD did not identify any known or planned improvements to police protection facilities in the service area of the Project. See correspondence included in Appendix K of this EIR.

<sup>18</sup> 89.3 KPCC Southern California Public Radio, Crime & Justice, LAPD: Crime in Los Angeles Down for the 11<sup>th</sup> Straight Year, as reported by the LAPD, <http://www.scpr.org/news/2014/01/13/41574/lapd-crime-in-los-angeles-down-for-the-11th-straight>. Accessed July 2019.

<sup>19</sup> Ibid.

**TABLE IV.K.2-1  
POPULATION, OFFICER, AND CRIME COMPARISON**

<b>Service Area</b>	<b>Square Miles</b>	<b>Resident Population</b>	<b>Sworn Officers</b>	<b>Officers/ Resident Ratio</b>	<b>Crimes</b>	<b>Crimes per 1,000 Residents</b>
Hollywood Community Police Station	13.34 <sup>a</sup>	165,000 <sup>a</sup>	352 <sup>a</sup>	1/468 <sup>a</sup>	2,683 <sup>a, b</sup>	16 <sup>c</sup>
Citywide	473 <sup>d</sup>	3,931,227 <sup>e</sup>	9,897 <sup>d</sup>	1/397	125,430	32 <sup>f</sup>

Notes

<sup>a</sup> Officer Christopher Gibson, Community Relationship Division, LAPD, written correspondence, dated June 29, 2017. (Appendix K to this Draft EIR.)

<sup>b</sup> Crime data for 2016 (the latest whole year for which annual crime data was available at the time of the EIR NOP). Officer Christopher Gibson, Community Relationship Division, LAPD, written correspondence, dated June 29, 2017

<sup>c</sup> 2,683 crimes/165,000 residents = 0.016 X 1,000 = 16 crimes per 1,000 residents,

<sup>d</sup> Los Angeles Police Department, COMPSTAT Citywide Profile, 12/04/16-12/31/16, <http://assets.lapdonline.org/assets/pdf/123116cityprof.pdf>, accessed November 2017.

<sup>e</sup> As reported in Table IV.J-1 in Section IV.J, *Population and Housing*, of this Draft EIR. The COMPSTAT Profile identified in footnote d cites the Citywide population as 3,962,726 which was the 2010 Census population. As the number of officers and crimes as cited in the table are tied to 2015 and 2016 data, the 2016 population estimate has been used for calculating Citywide officer and crime ratios.

<sup>f</sup> 125,430 crimes/3,931,227 residents = 0.031906 X 1,000 = 32 crimes per 1,000 residents.

SOURCE: ESA, November 2019.

However, in 2015, overall crime increased in all categories, with violent crime increasing Citywide by 20 percent and property crime increasing by 10 percent.<sup>20</sup> According 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.<sup>21</sup>

In response to Citywide crime increases, the City has responded in various ways. 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 (DART); expanding the Gang Reduction and Youth Development (GRYD) program to include twice

<sup>20</sup> Los Angeles Police Department, LAPD Statement on Crime Fighting Strategies, January 20, 2016, [http://www.lapdonline.org/home/news\\_view/60015](http://www.lapdonline.org/home/news_view/60015), accessed November 2017.

<sup>21</sup> Los Angeles Police Department, LAPD Statement on Crime Fighting Strategies, January 20, 2016, [http://www.lapdonline.org/home/news\\_view/60015](http://www.lapdonline.org/home/news_view/60015), accessed November 2017.

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.<sup>22</sup>

**Table IV.K.2-2, *Hollywood Community Area Crime Statistics (2016)***, summarizes the crime statistics for the Hollywood Community Area from 2016 (the latest whole year for which annual crime data is available). As reported therein, the number of crimes in the Hollywood Community Area totaled 2,683, with most of the crimes related to personal/other theft.

**TABLE IV.K.2-2  
HOLLYWOOD COMMUNITY AREA CRIME STATISTICS (2016)<sup>A</sup>**

<b>Crime</b>	<b>Number</b>	<b>Percent of Hollywood Community Area Crime</b>
Homicide	1	0%
Rape	38	1%
Robbery	253	9%
Aggravated Assault	278	11%
Burglary	282	11%
Motor Vehicle Theft	276	10%
Burglary From Motor Vehicle	722	27%
Personal/Other Theft	833	31%
<b>Total</b>	<b>2,683</b>	<b>100%</b>

Note:

<sup>a</sup> Crime data for 2016 (the latest whole year for which annual crime data was available at the time of the EIR's NOP).

SOURCE: Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, letter correspondence, dated April 25, 2017. (Appendix K to 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:

<sup>22</sup> Los Angeles Police Department, LAPD Statement on Crime Fighting Strategies, January 20, 2016, [http://www.lapdonline.org/home/news\\_view/60015](http://www.lapdonline.org/home/news_view/60015), accessed July 2019.

**Threshold (a): *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.***

In assessing the Project's potential impacts related to police protection services in this section, the City has determined to use Appendix G to the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G questions:

- The population increase resulting from the 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**

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and type of calls for service. Changes in these factors resulting from a project may affect the demand for service. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical averages associated with the police station serving the Project Site and Citywide services. The determination of impact on the capability of existing police services and personnel is based in part on the potential for the annual crimes per resident in the Hollywood Community to exceed current averages due to the addition of the Project. Project design features that would reduce the impact of the Project on police services are also described. In consideration of these factors, a determination is made as to whether existing police protection services could accommodate the additional demand resulting from the Project without the need for a new facility or the alteration of existing facilities to maintain acceptable service ratios.

## c) Project Design Features

### (1) Construction

The following Project Design Feature would provide Project Site security and reduce the Project's potential construction impacts on LAPD services:

**PDF-POL-1:** During construction, the Project Applicant will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting focused on the building site (no direct glare or light spill-over on neighboring properties), and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

**PDF-TRAF-1: Construction Traffic Management Plan**, presented in Section IV.L, *Transportation*, would ensure that emergency service providers would have adequate access to the Project Site and neighboring businesses.

### (2) Operation

The following security measures would be implemented by the Project:

**PDF-POL-2:** During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. The Project's security will include, but not be limited to, the following design features:

- Installing and utilizing a 24-hour security camera network throughout the underground parking structures, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage shall be maintained for at least 30 days, and such footage shall be provided to the LAPD, as needed;
- Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed;
- Maintaining staff on-site, including at the lobby concierge desk and within the car valet areas.
- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an electronic key fob specific to each user;

- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but 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 the property; and
- Maintaining unrestricted access to commercial/restaurant uses during business hours, with public access (except for authorized persons) prohibited after the businesses have closed.

**PDF-POL-3: Landscaping.** Project landscaping will be designed so as not to impede visibility.

**PDF-POL-4: Participation in Community Crime Prevention Efforts.** The Project residential association and commercial uses will participate in any community crime prevention efforts (e.g., Neighborhood Watch) that may be active in the Project area.

**PDF-POL-5: Provision of Project Diagrams to LAPD.** Prior to the issuance of a Certificate of Occupancy, the Project Applicant will submit a diagram of the Project Site to the Los Angeles Police Department West Bureau Commanding Officer that includes access routes and any additional information requested by the Los Angeles Police Department as necessary to facilitate police response.

## **d) Analysis of 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 police protection?***

### **(1) Construction**

During construction, equipment, building materials, vehicles, and temporary offices, would be temporarily located on the Project Site. As such, the Project Site, if not properly secured, could be subject to theft or vandalism, potentially requiring LAPD involvement. As provided in PDF-POL-1 and PDF-TRAF-1, the Project would incorporate a number of temporary security measures, including security barriers and fencing, low-level security lighting, and locked entry to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Low-level security lighting will be focused on the construction site and will not generate direct glare or light spillage onto adjacent residential properties. Regular daily and multiple security patrols during non-construction hours will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction

activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor. Potential effects on adjacent street accessibility would be reduced with flagging and traffic control personnel. Additionally, construction workers generally start and end their work days in advance of peak traffic hours, thus reducing their potential effect on traffic and emergency responses. As described in Section IV.L, *Transportation*, a Construction Management Plan subject to review and approval by the City of Los Angeles Department of Transportation (LADOT) would be incorporated into the Project as provided in PDF-TRAF-1. The Construction Management Plan would 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. The various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. **Based on the above, Project 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. Therefore, potential impacts on police protection services due to construction activity would be less than significant, and no mitigation is required.**

## (2) Operation

The Project's new development would introduce additional residents, employees, and visitors to the Project Site that could potentially result in an increase in LAPD police responses. As discussed in the Environmental Setting section above, the Project Site is served by the Hollywood Community Police Station, which has approximately 352 sworn officers. The station currently services a residential population of approximately 165,000 people, and reported 2,683 crimes in 2016. This represents an officer to population ratio of approximately one to 468 and an annual crime rate of 16 crimes per 1,000 residents. As shown in **Table IV.K.2-2, *Estimated Project Service Population for the Project Site***, the Project's estimated net police service population would be 740 persons. Based on a generation factor of 16 crimes per 1,000 residents, and without accounting for Project characteristics and security and/or design features and personnel, the Project could potentially result in approximately 12 additional crimes per year. This represents the potential for an approximately 0.45 percent increase in crimes reported in the Hollywood Community. The increase in population from 165,000 residents to 165,740 residents in the Hollywood Community Police Station service area would reduce the officer to resident ratio from one officer per 468 residents to one officer per 471 residents, assuming no additional officers are hired. This does not account for benefits provided through Project security personnel and features, which would likely minimize the number of Project-related crimes per year.



**TABLE IV.K.2-2**  
**ESTIMATED PROJECT SERVICE POPULATION FOR THE PROJECT SITE**

<b>Land Use</b>	<b>Units</b>	<b>Conversion Factor<sup>a</sup></b>	<b>Total Police Service Population</b>
<b>Existing</b>			
Residential	44 du	3 persons/unit	132
<b>Proposed</b>			
Residential	210 du	3 persons/unit	630
Hotel Rooms	136 rooms	1.5 persons/room/day	204
Commercial/Restaurant	12,570 sf	0.003 persons/sf	38
<i>Subtotal Proposed</i>			<i>872</i>
<b>Project Net Police Service Population (Proposed – Existing)</b>			<b>740</b>

## NOTE:

du = dwelling units; sf = square feet.

<sup>a</sup> The following L.A. City CEQA Thresholds Guide, K. Police Service Population Conversion Factors were used: Residential (Studio, one-, and two-bedroom units): 3 persons/unit; Retail: 3 persons/1,000 sf; and Hotel: 1.5 persons/room/day. The average household size is 2.43 persons per household based on the 2016 American Community Survey 5-year average estimate (2012-2016). Therefore, the project's 210 dwelling units are estimated to generate a direct population increase of approximately 510 new people. However, the existing 44 residential units are estimated to have an existing population of approximately 107 existing people. Overall, the project is estimated to result in a net increase of 166 dwelling units and approximately 403 people on the site when compared to existing conditions (510 new people – 107 existing people = 403). However, Section K. Police Service Population Conversion Factors in the L.A. City CEQA Thresholds Guide also provides police service population factors for residential uses. Based on these factors, full buildout of the Project would generate a net police service population of approximately 740 persons. Note that the resulting population is greater than the calculation included in Section IV.J., *Population and Housing* of this Draft EIR prepared for the Project. The higher police service population for the Project (which is based on the police service population factors in the L.A. City CEQA Thresholds Guide) is used for purposes of providing a conservative analysis of impacts on police services provided by the Hollywood Community Police Station.

SOURCE: ESA, 2019.

PDF's POL-2 through POL-5, which are incorporated into the Project, would help to offset the Project's operational demand for police protection services from LAPD. As provided in PDF-POL-2, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. The Project will install and utilize a 24-hour security camera network throughout the underground and above-ground parking structure; 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. Staff will be maintained on site, including the at the lobby concierge desk and within the car valet areas. Designated staffers will be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed. Duties of the security personnel will include, but will 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 the property. Unrestricted access to commercial/restaurant uses will be maintained during business hours, with public access prohibited after the businesses have closed. Additional Project features include the design of Project landscaping so as to not impede visibility as required by PDF-POL-3; participation in community crime prevention efforts as required by PDF-POL-4; and the provision of Project diagrams as required by PDF-POL-5. These security features would help offset Project-related increase in demand for LAPD services.

Project-related increase in traffic on surrounding roadways could potentially affect emergency response in the area. However, due to the Project Site's close proximity to the Hollywood Community Police Station, approximately 0.90 miles southwest, emergency responses are not expected to be substantially affected. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles will have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site. Finally, the Project will be required to provide adequate access for emergency vehicles to the Project Site, subject to the approval of the LAPD. Consistent with the City of Hayward v. Trustees of California State University,<sup>23</sup> significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project to mitigate. Accordingly, impacts associated with emergency response and emergency access are considered less than significant.

For these reasons, the Project's estimated potential to create the need for two additional officers is considered to be conservative, and does not account for the reductions in the demand for police services that will be created by the security personnel and multiple security measures that would be incorporated into the Project, including CPTED. Accordingly, and given that LAPD has no known or proposed plans to expand their Hollywood police facilities,<sup>24</sup> the Project is not expected to require the construction of new or expanded police facilities to meet Project demand. Even if a new police station, or the

<sup>23</sup> Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/15; City of Hayward v. Board of Trustees (Alameda County Superior Court No. RG09480852); Hayward Planning Association et al., v. Board of Trustees of the California State University, Available at: <https://cases.justia.com/california/court-of-appeal/2015-a131412a.pdf?ts=1448931626>. Accessed November 2017.

<sup>24</sup> Per correspondence with the LAPD, LAPD did not identify any known or planned improvements to police protection facilities in the service area of the project. See correspondence included in Appendix K of this EIR.

expansion, consolidation, or relocation of an existing station were determined to be warranted by LAPD, and were foreseeable, the impacts of the construction and operation of such a station would be analyzed at that time under CEQA as a project independent of the proposed Project. Moreover, the Hollywood community is highly developed, and the site of a new police station or the expansion of a police station would likely be on an infill lot, with expansions often being less than an acre in size in a highly urbanized area. Generally, development associated with typical police stations is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically anticipated to be addressed pursuant to CEQA through the use of a Class 32 categorical infill exemptions (CEQA Guidelines 15332) or (mitigated) negative declarations since they are likely relatively small structures on infill parcels. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact of the Project or one that the Project is required to mitigate,<sup>25</sup> and is speculative. Further the Project would generate revenue (e.g., property and sales tax revenue) for the City's general fund that could be used to fund LAPD expenditures as necessary to offset any incremental Project impact on police services. 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, which are typically financed through the City general funds. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated to the priorities at the time.

**Based on the above, Project operation would not create the need for new or physically altered police facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios, response times or objectives. Therefore, potential impacts on police protection services during Project operation would be less than significant.**

### **e) Cumulative Impacts**

Chapter III, *General Description of Environmental Setting*, of this Draft EIR, identifies 137 related projects that are anticipated to be developed within the vicinity of the Project Site.

For purposes of this analysis of cumulative impacts on police protection services, only those related projects located within the Hollywood Community Police Station service area are considered as related projects. Projects located in other police jurisdictions would be served by their respective police stations. Of the 137 related projects identified in Chapter III, all but 18 related projects (related projects, 39, 40, 47, 59, 70, 80, 81, 83, 94, 95, 97, 100, 103, 106, 119, 120, 123, and 132) are located within the Hollywood Community Police Station service area. These related projects include various residential,

<sup>25</sup> Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/15; City of Hayward v. Board of Trustees (Alameda County Superior Court No. RG09480852); Hayward Planning Association et al., v. Board of Trustees of the California State University. Available at: <https://cases.justia.com/california/court-of-appeal/2015-a131412a.pdf?ts=1448931626>. Accessed July 31, 2019.

office, commercial/retail/restaurant, hotel and school uses. **Table IV.K.2-3, *Cumulative Population for Police Services***, shows the estimated cumulative police service populations. The location of these related projects in relation to the Hollywood Community Police Station are shown in **Figure IV.K.2-2, *Hollywood Community Police Station Service Boundaries and Related Projects***.

**TABLE IV.K.2-3  
CUMULATIVE POPULATION FOR POLICE SERVICES**

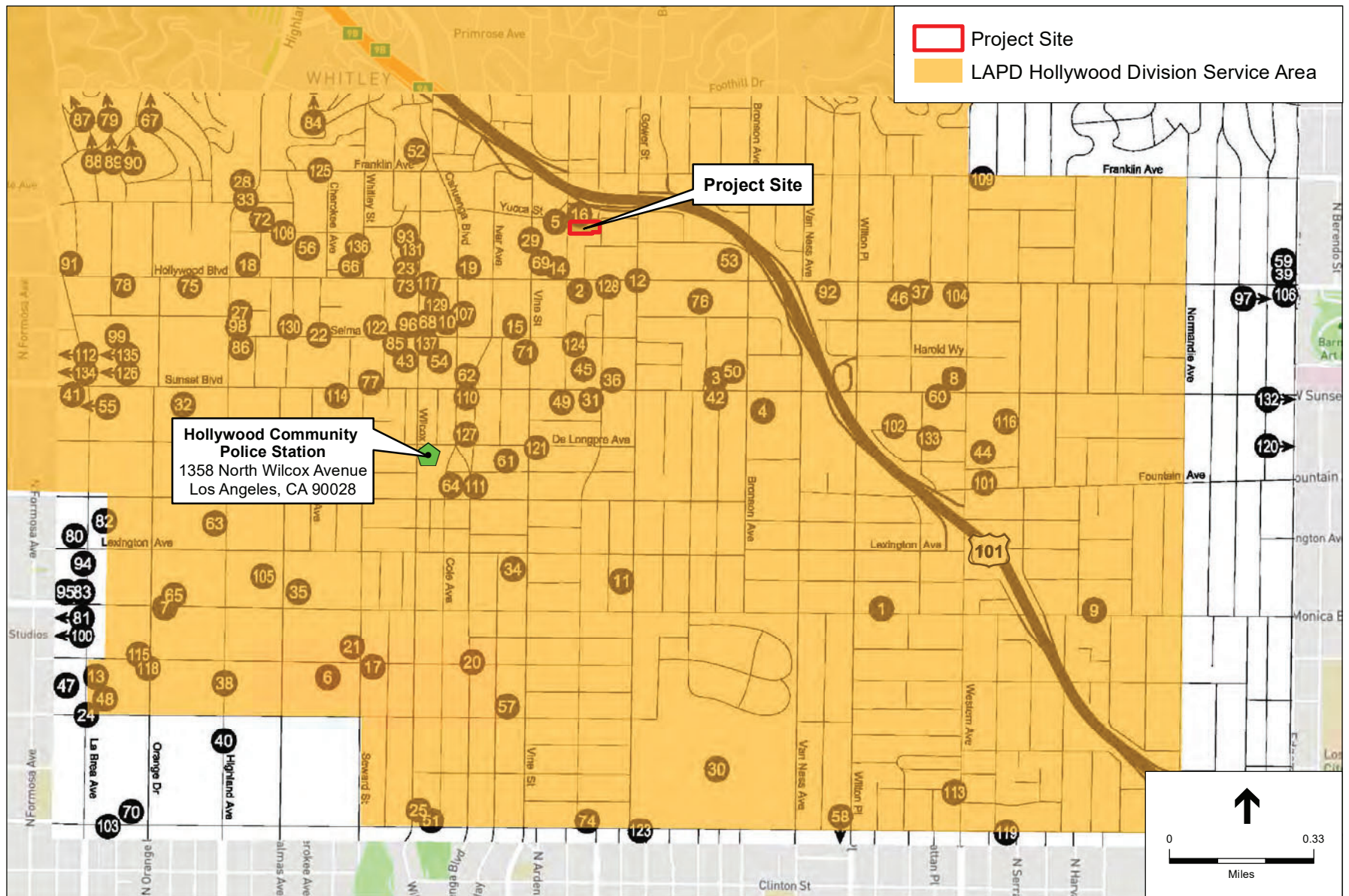
<b>Land Use</b>	<b>Amount of Development<sup>a</sup></b>	<b>Units</b>	<b>Conversion Factor<sup>b</sup></b>	<b>Total Police Service Population</b>
<b>Related Projects</b>				
Residential	15,326	units	3 persons/unit	45,978
Office	5,331,486	sq.ft.	0.004 persons/sf	21,326
Commercial/Retail/ Restaurant	2,655,390	sq.ft.	0.003 persons/sf	7,966
Hotel	4,782	Rooms	1.5 persons/room/day	7,173
Schools	100			100
Other	67,991	sq.ft.	0.004 persons/sf	272
<b>Total Related Projects</b>				<b>82,815</b>
<b>Proposed Project</b>				<b>740</b>
<b>Cumulative Population</b>				<b>83,555</b>

NOTES:

<sup>a</sup> Amount of development minus Related Projects Nos. 39, 40, 47, 59, 70, 80, 81, 83, 94, 95, 97, 100, 103, 106, 119, 120, 123 and 132.

<sup>b</sup> The following L.A. City CEQA Thresholds Guide, K. Police Service Population Conversion Factors were used: Residential (Studio, one-, and two-bedroom units): 3 persons/unit; Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf; Hotel: 1.5 persons/room/day; and for Other, a conservative conversion factor of 4 persons/1,000 sf was used. The average household size is 2.43 persons per household based on the 2016 American Community Survey 5-year average estimate (2012-2016). Therefore, project's 210 dwelling units is estimated to generate a direct population increase of approximately 510 new people. However, the existing 44 residential units is estimated to result in an existing population of approximately 107 existing people. Overall, the project is estimated to result in a net increase of 166 dwelling units and approximately 403 people on the site when compared to existing conditions (510 new people – 107 existing people = 403). However, Section K. Police Service Population Conversion Factors in the L.A. City CEQA Thresholds Guide also provides police service population factors for residential uses. Based on these factors, full buildout of the Project would generate a net police service population of approximately 740 persons. Note that the resulting population is greater than the calculation included in *Section IV.J., Population and Housing* of this Draft EIR prepared for the Project. The higher police service population for the Project (which is based on the police service population factors in the L.A. City CEQA Thresholds Guide) is used for purposes of providing a conservative analysis of impacts on police services provided by the Hollywood Community Police Station.

SOURCE: ESA, 2019.



SOURCE: Open Street Map 2017.

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**Figure IV.K.2-2**

Hollywood Community Police Station Service Boundaries and Related Projects

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Due to their proximity to the Project Site, should Project construction occur concurrently with the construction of Related Project Nos. 5 and 16, coordination with these construction sites would be implemented through each Project's respective construction management plan, which would ensure emergency access and traffic flow are maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response within the Project vicinity, as 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. Finally, the Project in and of itself would not substantially affect police services during construction. Therefore, the Project's contribution to cumulative impacts during construction on LAPD's emergency response would not be cumulatively considerable.

As reported in Table IV.K.2-3, the Project's estimated net police service population of 740 persons plus the related projects' estimated police service population of 82,815 persons would together generate an increase of an estimated 83,555 persons within LAPD's Hollywood Community Plan Area. Based on a crime generation rate of 16 annual crimes per 1,000 residents (i.e., 0.016), the cumulative police service population of 83,555 persons could generate an additional 1,337 crimes,<sup>26</sup> which would represent a 50 percent<sup>27</sup> increase over existing conditions within the Hollywood Community Plan Area. If no new officers were hired, the service ratio upon buildout of cumulative development would be one officer per 706 residents.<sup>28</sup> In order to maintain the existing officer to population ratio (1/468) within the Hollywood Community, approximately 179 new officers, an officer increase of 151 percent, would be required upon buildout of cumulative development.<sup>29</sup> However, it is expected that the related projects (particularly those of a larger nature) would be subject to review by LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons per standard development practices for the given uses. In addition, the Project vicinity and general Community Plan area are highly urbanized and it is assumed each of the related projects identified, as well as other future development within the Community Plan area would likewise be developed within an acceptable distance from one or more existing police stations.

<sup>26</sup> 83,555 estimated police service population X 0.016 annual crimes per capita = 1,337 additional crimes per year.

<sup>27</sup> 1,337 additional crimes per year/2,683 annual crimes = 50 percent.

<sup>28</sup> 165,000 existing residents + 83,555 estimated police population = 248,555 estimated police population/352 existing officers = one officer per 706 residents.

<sup>29</sup> 83,555 persons X one officer per 468 residents = 179 additional officers.

As discussed above for the Project, LAPD has no known or proposed plans to expand the Hollywood Police Station, even in consideration of the related projects. If expanded police facilities were determined warranted by the LAPD, and were foreseeable, the impacts of the construction and operation of such a station would be analyzed at that time under CEQA as a project independent of the proposed Project. Moreover, the areas with police stations serving the related projects are highly developed, and the expansion of any police station would be on an infill lot potentially less than an acre in size. Generally, development associated with typical police stations is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically anticipated to be addressed pursuant to CEQA through the use of a Class 32 categorical infill exemptions (CEQA Guidelines 15332) or (mitigated) negative declarations since they are likely relatively small structures on infill parcels. Accordingly, the need for additional police protection services as part of an unplanned or expanded police station at this time is not an environmental impact of the Project or one that the Project is required to mitigate, and is speculative.<sup>30</sup>

In addition, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated to the priorities at the time. Similar to the Project, related projects would generate revenue (e.g., property and sales tax revenue) for the City's general fund that could be used to fund LAPD expenditures as necessary to offset any cumulative incremental impact from each related project on police services. 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, which are typically financed through the City general funds.

With regard to emergency response, the Project and related projects would introduce new uses which would generate additional traffic in the vicinity of the Project Site. Traffic from the Project and related projects could have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the service area of the Hollywood Community Police Station and the Project would not significantly contribute to a cumulative impact regarding emergency response. As is the case under existing conditions, emergency vehicles would access the Project Site and each of the related projects directly from the

<sup>30</sup> Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/15; City of Hayward v. Board of Trustees (Alameda County Superior Court No. RG09480852); Hayward Planning Association et al., v. Board of Trustees of the California State University, Available at: <https://cases.justia.com/california/court-of-appeal/2015-a131412a.pdf?ts=1448931626>. Accessed July 2019.



surrounding roadways. The drivers of 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 of opposing traffic. As such, emergency access to the Project Site vicinity would be maintained at all times, and the increase in cumulative traffic generated by the Project and related projects would not significantly impact emergency vehicle response times to the Project Site vicinity, including along designated disaster routes. Further, consistent with the *City of Hayward v. Trustees of California State University*,<sup>31</sup> significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area a project, and potential impacts on emergency response are not an environmental impact that CEQA requires a project to mitigate.

**Based on the above considerations, the Project would not make a cumulatively considerable contribution to the need for the construction of new, or expanded police facilities and, as such, cumulative impacts on police protection services would be less than significant.**

#### **f) Mitigation Measures**

Project impacts regarding police protection and services would be less than significant. Therefore, no mitigation measures are required.

#### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to police protection and services would be less than significant prior to mitigation and no mitigation measures are required.

<sup>31</sup> Court of Appeal of the State of California, First Appellate District, Division Three, Filed 11/30/15; *City of Hayward v. Board of Trustees* (Alameda County Superior Court No. RG09480852); *Hayward Planning Association et al., v. Board of Trustees of the California State University*. Available at: <https://cases.justia.com/california/court-of-appeal/2015-a131412a.pdf?ts=1448931626>. Accessed November 2017.



## **IV. Environmental Impact Analysis**

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### **K.3. Public Services – Schools**

#### **1. Introduction**

This section of the Draft EIR evaluates the Project's potential construction and operational impacts on school facilities and services operated by Los Angeles Unified School District (LAUSD). This analysis estimates the number of students that would be generated by the Project based on LAUSD student generation rates and addresses whether LAUSD school facilities would have sufficient available capacity to accommodate these students. The analysis addresses all levels of educational facilities operated by LAUSD (i.e., elementary, middle, and high schools). This analysis is based, in part, on written correspondence with LAUSD, which is included in Appendix K, of this Draft EIR.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) Federal**

While public education is generally regulated at the State and local levels, the federal government is involved in providing funding for specialized programs (i.e., school meals, Title 1, Special Education, School to Work, and Goals 2000). However, these monies are not used for general educational purposes and are not applicable to the discussion herein.

###### **(2) State of California**

###### **(a) *California Education Code***

LAUSD facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. 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.<sup>1</sup>

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<sup>1</sup> California Education Code Section 17620(a)(1).

(b) *Senate Bill 50*

The Leroy F. Greene School Facilities Act of 1998 (known as Senate Bill 50 or SB 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. SB 50 placed a \$9.2 billion State bond measure (Proposition 1A), which included grants for both, modernization of existing schools and construction of new schools, on the ballot for the November 3, 1998 election. The new construction grant provided by the passage of Proposition 1A provides funding on a 50/50 State and local match basis. The Proposition 1A modernization grant provides funding on a 60/40 State and local match 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.<sup>2</sup>

SB 50 permits the LAUSD to levy a fee, charge, dedication, 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 sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less than significant level.<sup>3</sup>

(c) *Property Taxes*

The operation of California's public school districts, including LAUSD, is largely funded by local property taxes. While property taxes are assessed at a local level, it is the State which allocates the tax revenue to each district according to average daily attendance rates.

(3) **Regional and Local Level**

(a) *Los Angeles Unified School District*

As stated above, the State is primarily responsible for the funding and structure of the local school districts, and in this case, LAUSD. As LAUSD provides education to students in many cities and county areas, in addition to the City of Los Angeles, its oversight is largely a district-level issue. Public schools operate under the policy direction of elected governing district school boards (elected from the local area) as well as by local propositions which directly impact the funding of facility construction and maintenance. Pursuant to SB 50, LAUSD collects developer fees for new construction within its boundaries. While the Hollywood Community Plan includes policies related to schools, such policies are directed towards the City and not to private development projects.

<sup>2</sup> State of California, Office of Public School Construction, School Facility Program Guide, October 24, 2012. Available at: <https://www.dgs.ca.gov/OPSC/Resources/Page-Content/Office-of-Public-School-Construction-Resources-List-Folder/Handbooks-Guides-and-Brochures>. Accessed September 12, 2017.

<sup>3</sup> Calif. Government Code § 65996.

## b) Existing Conditions

### (1) Existing LAUSD School System

The LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the U.S. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, along with all or portions of 26 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education to a total of 664,774 students with a total enrollment of 734,641 students when including adult education, enrolled throughout 1,302 schools and centers, including: 19 primary school centers, 451 elementary schools, 83 middle schools, 96 senior high schools, 54 option schools, 44 magnet schools, 24 multi-level schools, 12 special education schools, two home/hospital schools, 169 K–12 magnet centers (on regular campuses), 228 charter schools, and 120 other schools and centers.<sup>4</sup> For the 2016–2017 school year, the LAUSD employed 60,191 personnel, about half (44 percent) of whom are classroom teachers.<sup>5</sup> The Los Angeles Unified School District's Fiscal Year 2016–2017 total budget was around 7.59 billion.<sup>6</sup>

The LAUSD Facilities Services Division (FSD) is responsible for the execution of the District's school construction bond programs, the maintenance and operations of schools, the utilization of existing assets, and master planning for future capital projects.<sup>7</sup> The LAUSD's voter-approved Bond Program is currently valued at \$27.5 billion.<sup>8</sup> The FSD also manages a \$25.6 billion program to build new schools to reduce overcrowding and modernize existing campuses throughout the LAUSD. Until recently, the primary goal of the \$27.5 billion bond program had been to reduce overcrowding by providing students with the opportunity to attend a neighborhood school operating on a traditional, two-semester calendar. As the LAUSD nears achievement of this goal and shifts the bond program toward further investments in school facilities, the FSD is paving the way for the development and prioritization of future capital projects. This particularly applies to improving school sites with the most critical physical conditions and so they are safe, healthy, and functional places for education. In 2014, the Board of Education approved the allocation of \$7.8 billion to the School Upgrade Program (SUP), the next phase of the LAUSD's bond program.<sup>9</sup> A current status of the execution of the LAUSD bond program is below:

<sup>4</sup> LAUSD, Fingertip Facts 2015-2016. [http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/32/Fingertip%20Facts15-16\\_final-updated.pdf](http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/32/Fingertip%20Facts15-16_final-updated.pdf), accessed July 2019.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Facilities Services Division, Los Angeles Unified School District Website, <http://www.laschools.org/new-site/>, accessed July 2019

<sup>8</sup> Facilities Services Division, Los Angeles Unified School District Website, <http://www.laschools.org/new-site/>, accessed July 2019.

<sup>9</sup> Facilities Services Division, Los Angeles Unified School District Website, <http://www.laschools.org/new-site/>, July 2019

- More than 600 new construction projects providing more than 170,000 new classroom seats have been delivered;
- More than 19,600 school modernization projects have completed construction to provide upgraded facilities to improve the learning environment for students;
- Solar panels on rooftops and parking shade structures throughout the LAUSD are anticipated to generate approximately 21.4 megawatts of solar energy;
- School network infrastructure upgrades at all of the LAUSD's K–12 school sites are nearly completed; and
- Over 575 Board-approved projects valued at \$4.0 billion are in pre-construction phase and another 300 plus projects valued at \$475 million are under construction.<sup>10</sup>

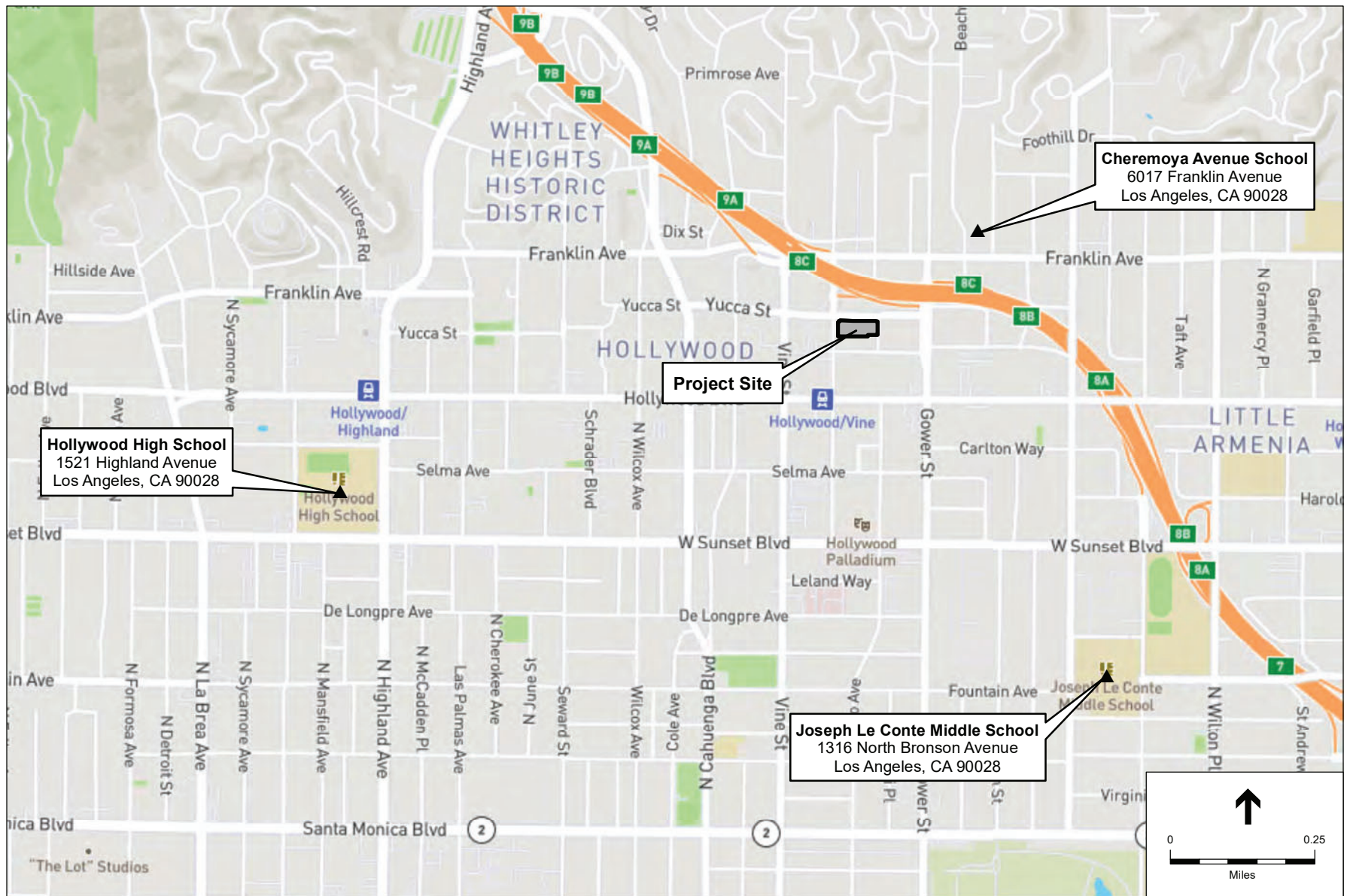
The LAUSD is currently divided into six local districts (Central, East, Northeast, Northwest, South, West), with the Project Site being located in the Local District West.<sup>11</sup> As shown in **Figure IV.K.3-1, Schools Located in the Vicinity of the Project Site**, below, the Project Site is located 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. **Table IV.K.3-1, Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site**, lists these schools, as well as their location, distance/direction from the Project Site, current capacity, residential and actual enrollments, and available seating capacity. Per the 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 school) compared to the respective school's current capacity.

As shown in Table IV.K.3-1, which is based on the information that is available from the LAUSD,<sup>12</sup> both the Cheremoya Avenue Elementary School and the Hollywood High School are currently operating within capacity, while the Joseph Le Conte Middle School is not operating within capacity. The Cheremoya Avenue Elementary School, at 6017 Franklin Avenue, is located approximately 0.20 miles northeast of the Project Site. Based on the school's current capacity of 388 students and a residential enrollment of 310 students, the school has an estimated available capacity of 78 seats. The Joseph Le Conte Middle School, at 1316 North Bronson Avenue, is located approximately 0.85 miles southeast of the Project Site. Based on the school's current capacity of 782 students and a residential enrollment of 1,195 students, the school has an estimated shortage of capacity of 413 students.

<sup>10</sup> Facilities Services Division, Los Angeles Unified School District Website, <http://www.laschools.org/new-site/>, accessed July 2019.

<sup>11</sup> Los Angeles Unified School District, Local District West Map, dated May 2015, <https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22573&dataid=24308&FileName=West.pdf>, accessed July 2019.

<sup>12</sup> Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, July 11, 2017. (Appendix K to this Draft EIR.)



SOURCE: Open Street Map 2017.

6220 West Yucca 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**

<b>School</b>	<b>Distance/ Direction From Project Site <sup>a</sup></b>	<b>Current Capacity <sup>b</sup></b>	<b>Resident Enrollment <sup>c</sup></b>	<b>Actual Enrollment <sup>d</sup></b>	<b>Current Seating Overage (shortage) <sup>e</sup></b>
Cheremoya Avenue Elementary School (K–6)	0.20 miles northeast	388	310	328	78
Joseph Le Conte Middle School (6–8)	0.85 miles southwest	782	1,195	938	(413)
Hollywood High School (9–12)	0.75 miles southeast	1,591	1,197	1,516	394

Notes:

<sup>a</sup> Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

<sup>b</sup> 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.

<sup>c</sup> 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. A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

<sup>d</sup> The number of students actually attending the school presently, including magnet students.

<sup>e</sup> Current capacity minus residential enrollment.

TRK = track.

SOURCE: Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, July 11, 2017. (Appendix K to this Draft EIR.)

Hollywood High School, at 1521 Highland Avenue, is located approximately 0.75 miles southwest of the Project Site. Based on the school's current capacity of 1,591 students and a residential enrollment of 1,197 students, the school has an estimated available capacity of 394 seats. A school would be considered currently overcrowded if the school is currently on a multi-track calendar; there is a currently a seating shortage; and/or there is currently a seating overage of less than or equal to a "safety margin" of 20 seats.<sup>13</sup> According to the LAUSD criteria, only Joseph Le Conte Middle School is currently considered overcrowded.<sup>14</sup>

<sup>13</sup> Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, July 11, 2017. (Appendix K to this Draft EIR.)

<sup>14</sup> Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, dated July 11, 2017. (Appendix K to this Draft EIR.)

## (2) Open Enrollment Policy

The open enrollment policy is a State-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats.<sup>15</sup> Open enrollment transfers are issued on a space-available basis only. No student living in a particular school's attendance area will be displaced by a student requesting an open enrollment transfer. Open enrollment seats are granted through an application process that is completed before the school year begins.

## (3) Charter Schools

Charter schools originated from the Charter School Act of 1992. Typically, a charter school is granted by the LAUSD Board of Education and approved by the State for a period of up to five years. LAUSD maintains two types of charter schools: conversion charters, which are existing schools that later become charters, and start-ups, which are newly created by any member of the public (e.g., educators, parents, foundations, and others). Charter schools are open to any student who wishes to attend, from any area with LAUSD. If a charter school has more new applications than it can accommodate, it must hold a lottery.<sup>16</sup> Currently, there are 277 charter schools (53 Affiliated, 224 Independent) under the jurisdiction of the LAUSD, serving more than 138,000 students in kindergarten through 12th grade.<sup>17</sup> The charter schools within an approximately two-mile radius of the Project Site include the Citizens of the World Charter School Hollywood, Santa Monica Boulevard Community Charter School, Academic Performance Excellence Academy (APEX Academy), Larchmont Charter School (El Centro), and Larchmont Charter School (Fairfax). Based on information provided by LAUSD, charter schools do not have attendance boundaries and enrollment data for charter schools are not regularly reported to LAUSD. Thus, enrollment projections or capacity analyses provided by LAUSD is not inclusive of charter schools.<sup>18</sup>

## (4) Magnet Schools

The option to attend “magnet” programs is also available to students living within the service boundaries of LAUSD. Magnet programs provide specialized curriculums and instructional approaches to attract a voluntary integration of students from a variety of neighborhoods. Magnet programs typically establish a unique focus such as gifted and talented, math and science, performing arts, or basic skills programs. Some magnet programs occupy entire school sites, while other magnet centers are located on regular school campuses with access to activities and experiences shared with the host school.

<sup>15</sup> LAUSD website. K12 Open Enrollment. Available at: <https://achieve.lausd.net/K12OpenEnrollment>. Accessed July 2019.

<sup>16</sup> LAUSD Charter Schools Division, About Charter Schools. Available at: <https://achieve.lausd.net/Page/1816>. Accessed July 2019.

<sup>17</sup> Ibid.

<sup>18</sup> LAUSD, letter from Rena Perez, Director LAUSD, Facilities Services Division, dated December 18, 2015 for Crossroads Hollywood EIR (SCH No 2015101073).

Currently, there are 292 magnet programs located within LAUSD.<sup>19</sup> Schools within the area include Hollywood High School (Performing Arts, Communication/Technology), Fairfax High School (Visual and Performing Arts), Bancroft Middle School (Visual and Performing Arts and Gifted/Highly Gifted/High Ability), Le Conte Middle School (Communication Arts and International Humanities Health/Engineering/Applied Sciences/Technology), and Melrose Elementary School (Science/Technology/Math).<sup>20</sup>

### (5) Pilot Schools

Pilot schools were established in February 2007 when a Memorandum of Understanding was ratified by LAUSD and the United Teachers of Los Angeles to create and implement ten small, autonomous Belmont Pilot Schools within District 4 with a specific focus on creating new, innovative schools to relieve overcrowding at Belmont High School.<sup>21</sup> Pilot schools are a network of public schools that have autonomy over budget, staffing, governance, curriculum and assessment, and the school calendar.<sup>22</sup> Currently, there are 44 pilot schools located within LAUSD.<sup>23</sup>

### (6) Proposed New Public Schools

According to LAUSD, no new public school construction is planned in the Project vicinity.<sup>24</sup>

### (7) Private Schools in the Project Vicinity

In addition to public schools, a number of private schools are also available in the Project vicinity that could potentially serve as alternatives to LAUSD schools. Specifically, there are approximately 12 private schools, ranging from pre-kindergarten through 12<sup>th</sup> grade, serving approximately 1,410 students within one mile of the Project's zip code.<sup>25</sup> These facilities generally have smaller student populations and higher teacher-to-student ratios than their public counterparts. This information is presented for informational purposes only, as it does not directly relate to current and future enrollment capacities of schools in LAUSD before or after implementation of the Project.

<sup>19</sup> LAUSD website, Magnet Information. Available at: <http://echoices.lausd.net/Magnet/Information>. Accessed July 2019.

<sup>20</sup> LAUSD website, available at: <https://explorelausd.schoolmint.net/school-finder/home>. Accessed July 2019.

<sup>21</sup> LAUSD website, History of Pilot Schools. Available at: <https://achieve.lausd.net/Page/2841>. Accessed July 2019.

<sup>22</sup> Ibid.

<sup>23</sup> Ibid.

<sup>24</sup> Letter from Rena Perez, Director, LAUSD, Facilities Services Division, dated July 11, 2017, attached in Appendix K of this Draft EIR.

<sup>25</sup> Private School Review, available at: <https://www.privateschoolreview.com/schools-by-distance/90028/1/None/0/0/None/None/0>. Accessed July 2019.



### 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 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?***

In assessing the Project's potential impacts related to schools in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G questions:

- 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 a project's effects on schools is based in part on the ability of LAUSD school facilities and services to accommodate the potential increase in students generated by development of the project. This analysis estimates the number of students that would be generated by the Project using LAUSD student generation rates, and focuses on whether the LAUSD school facilities that are expected to serve the Project would have sufficient available capacity to accommodate these students. School planning for future enrollments is 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 2016–2017 school year as a baseline. This analysis also addresses State regulations, i.e., SB 50, and cumulative development fees as a

mechanism for providing new school facilities and addressing the Project's potential impacts related to schools.

This analysis focuses on public schools served by the Project Site. In addition, this analysis does not take into account LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home schooling. In any case, students who opt to enroll within districts other than their home districts are required to obtain inter-district transfer permits to ensure that existing facilities of the incoming schools would not suffer impacts due to the additional enrollment. Additionally, this analysis is also conservative as it does not account for the fact that there are several charter schools, magnet schools, and private schools in the Project vicinity that could also serve Project residents, nor does it account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site.

### **c) Project Design Features**

There are no Project Design Features that relate to the Project's school enrollment-related effects.

### **d) Analysis of 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 or other performance objectives for schools?***

#### **(1) Construction**

Construction of the Project would require construction employees who would 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 short durations of work at a particular site, and the large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate their families or their residences within this region or from other regions as a result of their work on the Project. Accordingly, Project construction would not result in a notable increase in the resident population or generate new students needing to attend local schools.

**Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governments facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Therefore, construction impacts on school facilities and services would be less than significant.**

## (2) Operation

The Project would include the construction of 210 multi-family residential units, a 57,945 square-foot hotel with 136 hotel rooms, and approximately 12,570 square feet of commercial/restaurant uses. The Project Site is currently improved with 44 residential units, all of which would be demolished and removed to support development of the Project. Therefore, the Project would result in a net increase of 166 residential units on the Project Site when compared to existing conditions.

The LAUSD has established student generation rates for a variety of uses including residential development (multi-family) as well as other employment generating uses, e.g., hotel, and commercial/restaurant uses. Based on the LAUSD generation rates, the estimated number of students that could be generated by the Project is reported in **Table IV.K.3-2, *Estimated Number of Students Generated by the Project.***

As shown in Table IV.K.3-2, the Project is estimated to generate approximately 36 elementary school students, 9 middle school students, and 20 high school students, for a net increase of 65 students. However, subtracting the existing school students, the Project would result in a net increase of 29 elementary school students, seven middle school students, and 16 high school students, for a net increase of 52 students attending Project Site area schools over existing conditions.

As previously discussed, the students generated by the Project would attend Cheremoya Avenue Elementary School, Joseph Le Conte Middle School, and Hollywood High School. Information regarding LAUSD projections for 2021–2022 (Project buildout year) capacities and enrollments at these schools are shown in **Table IV.K.3-3, *Projected Buildout Year Capacity and Enrollment of LAUSD Schools Serving the Project Site.***

With the addition of Project-generated elementary students, Cheremoya Avenue Elementary School would have a shortage of six seats (349 seats – 355 seats), or 26 seats less than the 20-seat safety margin. Joseph Le Conte Middle School would have a shortage of 345 seats (727 seats – 1,072 seats), or 365 seats less than the 20-seat safety margin. Hollywood High School would have a seating overage of 411 seats (1,496 seats – 1,085 seats), or 391 seats more than the 20-seat safety margin.

**TABLE IV.K.3-2**  
**ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT**

<b>Land Use</b>	<b>Development</b>	<b>Units</b>	<b>Elementary School</b>	<b>Middle School</b>	<b>High School</b>	<b>Total<sup>e</sup></b>
<b>Existing Uses</b>						
Residential Single-Family <sup>a b</sup>	1	units	0 <sup>d</sup>	0	0	<1
Residential Multi-Family <sup>a c</sup>	43	units	7	2	4	13
<b>Total</b>			7	2	4	13
<b>Proposed Uses</b>						
Residential Multi-Family <sup>a, c</sup>	210	units	35	9	20	64
Hotel <sup>d</sup>	57,945	sq. ft.	1	0	0	1
Commercial/Restaurant <sup>d</sup>	12,570	sq. ft.	0	0	0	0
<b>Total Proposed</b>			36	9	20	65
<b>Net Increase (Proposed – Existing)</b>			29	7	16	52

## NOTES:

<sup>a</sup> Student Generation Rates for residential uses are based on the LAUSD's 2012 School Facilities Needs Analysis, September 2012.

<sup>b</sup> Residential generation rates per Single-family detached residential unit are: Elementary (K–6) = 0.1999; Middle School (7–8) = 0.0546; High School (9–12) = 0.1143

<sup>c</sup> Residential generation rates per Multi-family residential unit are: Elementary (K–6) = 0.1649; Middle School (7–8) = 0.0450; High School (9–12) = 0.0943.

<sup>d</sup> Student Generation rates for hotel, commercial, and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 -- the most recent data available for non-residential uses. Hotels, per each 1,000 sq. ft. of non-residential space – Elementary (K–6) = 0.0090; Middle School (7–8) = 0.0046; High School (9–12) = 0.0057. Commercial/restaurant per each 1,000 sq. ft. of non-residential space – Elementary (K–6) = 0.0178; Middle School (7–8) = 0.0089; High School (9–12) = 0.0111.

<sup>e</sup> Rounded to the nearest whole number.

SOURCE: LAUSD, ESA, 2019.

**TABLE IV.K.3-3**  
**PROJECTED BUILDOUT YEAR CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING**  
**THE PROJECT SITE WITH THE PROJECT**

<b>School</b>	<b>Projected Capacity<sup>a</sup></b>	<b>Projected Enrollment<sup>b</sup> Without Project</b>	<b>Projected Seating Overage/ (Shortage)<sup>c</sup> Without Project</b>	<b>Project-Generated Students<sup>d</sup></b>	<b>Projected Enrollment With Project</b>	<b>Projected Seating Overage/ (Shortage)<sup>e</sup> With Project</b>
Cheremoya Avenue Elementary School (K–6)	349	326	23	29	355	(6)
Joseph Le Conte Middle School (6–8)	727	1,065	(338)	7	1,072	(345)
Hollywood High School (9–12)	1,496	1,069	427	16	1,085	411

## NOTES:

<sup>a</sup> 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 (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes capacity of magnet programs.

<sup>b</sup> Projected five-year total number of students, without the Project, living in the school's attendance areas and who are eligible to attend the school. Includes magnet students.

<sup>c</sup> Projected seating overage or (shortage): equal to (projected capacity) – (projected enrollment), without the Project.

<sup>d</sup> As shown in Table IV.K.3-2, the Project is expected to generate approximately 36 elementary school students, nine middle school students, and 20 high school students for a total of 65 school students. However, subtracting the existing school students, the Project would result in a net increase of 29 elementary school students, 7 middle school students, and 16 high school students for a total of 52 school students over existing conditions.

<sup>e</sup> Projected seating overage or (shortage): equal to (projected capacity) – (projected enrollment with Project).

SOURCE: Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, dated July 11, 2017. (Appendix K to this Draft EIR.)

However, the Project's projected student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. The Project's large number of one-bedroom units (104 units) would generate few, if any, students. The Project's projected student generation is also conservative in that it assumes that none of the future Project residents with families would already have students attending the affected schools. Furthermore, a portion of the Project's school-aged children may attend alternative schools, such as private, charter, and magnet schools, which would also reduce attendance at LAUSD schools. For these reasons, the above estimate of the Project's projected student generation is considered conservative and likely overestimates the Project's actual potential to generate new students.

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. Nonetheless, as discussed 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,<sup>26</sup> it would require speculation to determine currently how any future shortages would be addressed, including where and what those facilities may be. At such time as new or expanded school facilities are proposed by LAUSD, the environmental impacts of those facilities would be evaluated by LAUSD under CEQA as a project independent of the proposed Project.

As discussed above, LAUSD's bond program funds improvements and upgrades to LAUSD school facilities. 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 in question are at capacity or not. **Pursuant to California Government Code Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts.<sup>27</sup> As such, the Project's impacts to school facilities and services would be less than significant.**

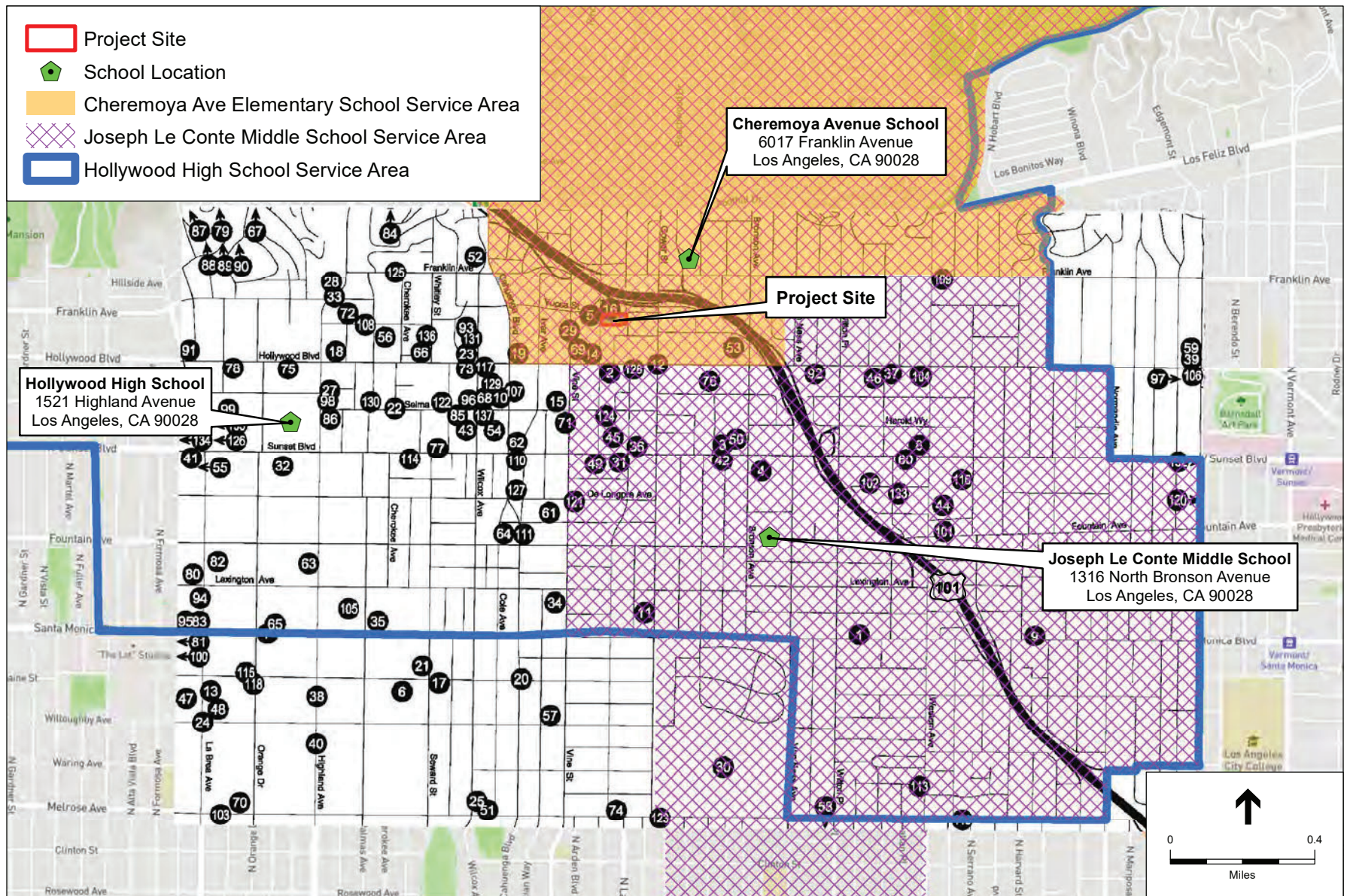
## e) Cumulative Impacts

Chapter III, General Description of Environmental Setting, of this Draft EIR, lists the 137 related projects identified by the City that are anticipated to be developed within 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 137 related projects identified in Chapter III, 110 are located within the attendance boundaries of one or more of the schools serving the Project Site and are included in the estimate of students generated by the related projects. The related projects include various residential, office, commercial/retail/restaurant, hotel and school uses. The locations of these related projects in relation to the school boundaries are shown in **Figure IV.K.3-2, School Service Boundaries and Related Projects**. **Table IV.K.3-4, Cumulative Student Generation**, shows the number of students projected to be generated by the related projects for each of the schools, the number of students projected to be generated by the Project and the cumulative total. Similar to the Project, the number of students anticipated to be generated by these related projects was estimated based on the type of development proposed. As shown in Table IV.K.3-4, these related projects could potentially generate 410 students at Cheremoya Avenue Elementary School, 497 students at Joseph Le Conte Middle School, and 1,505 students at Hollywood High School. The Project in conjunction with these related projects could therefore generate 439 students at Cheremoya Avenue Elementary School, 504 students at Joseph Le Conte Middle School, and 1,521 students at Hollywood High School. As explained below, these are conservative estimates.

<sup>26</sup> Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, July 11, 2017. (Appendix K to this Draft EIR.)

<sup>27</sup> 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."





SOURCE: Open Street Map 2017.

6220 West Yucca Project  
**Figure IV.K.3-2**  
 School Service Boundaries and Related Projects

**TABLE IV.K.3-4  
CUMULATIVE STUDENT GENERATION**

<b>Map No.<sup>a</sup></b>	<b>Project Description</b>	<b>Address</b>	<b>Elementary School (K–6)<sup>b, c, d</sup></b>	<b>Middle School (6–8)<sup>b, c, d</sup></b>	<b>High School (9–12)<sup>b, c, d</sup></b>
1	Paseo Plaza Mixed-Use	5651 W. Santa Monica Boulevard	0	23	45
2	El Centro (formerly BLVD 6200 Mixed-Use)	6200 W. Hollywood Boulevard	0	45	92
3	Mixed-Use	5939 W Sunset Boulevard	0	13	29
4	Sunset Bronson Studio	5800 W. Sunset Boulevard	0	6	7
5	Argyle House (formerly Yucca Street Condos)	6230 W. Yucca Street	14	4	8
8	SunWest Project (Mixed-Use)	5525 W. Sunset Boulevard	0	13	28
9	Mixed-Use	5245 W. Santa Monica Boulevard	0	3	7
10	Selma Hotel	6417 W. Selma Avenue	0	0	1
11	Hollywood Production Center	1149 N. Gower Street	0	3	5
12	Hollywood Gower Mixed-Use	6100 W. Hollywood Boulevard	36	10	21
14	Pantages Theater Office	6225 W. Hollywood Boulevard	6	3	4
15	Selma & Vine Office Project	1601 N. Vine Street	0	0	2
16	Kimpton Everly Hotel (formerly Argyle Hotel Project)	1800 N. Argyle Avenue	1	1	1
18	Restaurant	6757 W. Hollywood Boulevard	0	0	0
19	Hotel & Restaurant Project	6381 W. Hollywood Boulevard	0	0	0
22	Selma Community Housing	1603 N. Cherokee Avenue	0	0	6
23	Hudson Building	6524 W. Hollywood Boulevard	0	0	0
26	Restaurant & Deli	5500 W. Hollywood Boulevard	0	0	0
27	Mixed-Use	1610 N. Highland Avenue	0	0	23



Map No. <sup>a</sup>	Project Description	Address	Elementary School (K–6) <sup>b, c, d</sup>	Middle School (6–8) <sup>b, c, d</sup>	High School (9–12) <sup>b, c, d</sup>
28	Highland Avenue Indigo Hotel Project	1841 N. Highland Avenue	0	0	0
29	Millennium Hollywood Mixed-Use Project (current Project on this site is the Hollywood Center Project) <sup>28</sup>	1740 N. Vine Street	88	28	51
30	Paramount Pictures	5555 W. Melrose Avenue	0	19	0
31	6200 W. Sunset Boulevard	6200 W. Sunset Boulevard	0	12	25
32	Apartments	1411 N. Highland Avenue	0	0	8
33	Apartment Project	1824 N. Highland Avenue	0	0	11
34	Hotel	1133 N. Vine Street	0	0	0
35	The Lexington Mixed-Use	6677 W. Santa Monica Boulevard	0	0	74
36	Columbia Square Mixed-Use	6121 W. Sunset Boulevard	0	11	8
37	Mixed-Use (High Line West)	5550 W. Hollywood Boulevard	0	13	26
38	Tutoring Center <sup>e</sup>	927 N. Highland Avenue	33	33	34
41	Mixed-Use	7120 W. Sunset Boulevard	0	0	4
42	Sunset & Gordon Mixed Use	5935 W. Sunset Boulevard	0	14	30
43	Sunset + Wilcox	1541 N. Wilcox Avenue	0	0	1
44	Mixed-Use	1350 N. Western Avenue	0	11	24
45	Palladium Residences	6201 W. Sunset Boulevard	0	33	69
46	5600 W. Hollywood Boulevard	5600 W. Hollywood Boulevard	0	1	3
49	6250 Sunset (Nickelodeon)	6250 W. Sunset Boulevard	0	9	19
50	Mixed-Use	5901 Sunset Boulevard	0	4	5
52	Hotel	1921 Wilcox Avenue	0	0	0
53	1717 Bronson Avenue	1717 N. Bronson Avenue	15	4	9

<sup>28</sup> See Chapter III of this Draft EIR for additional details on the Hollywood Center Project.

Map No. <sup>a</sup>	Project Description	Address	Elementary School (K–6) <sup>b, c, d</sup>	Middle School (6–8) <sup>b, c, d</sup>	High School (9–12) <sup>b, c, d</sup>
54	Cahuenga Boulevard Hotel	1525 N. Cahuenga Boulevard	0	0	0
55	Sunset Mixed-Use	7500–7510 W. Sunset Boulevard	0	0	22
56	Las Palmas Residential (Hollywood Cherokee)	1718 N. Las Palmas Avenue	0	0	21
58	Apartments	525 N. Wilton Place	0	4	0
60	Target Retail Shopping Center Project	5520 W. Sunset Boulevard	0	2	2
61	Academy Square	1341 Vine Street	0	0	28
62	Ivar Gardens Hotel	6409 W. Sunset Boulevard	0	0	1
63	Mixed-Use	1233 N. Highland Avenue	0	0	7
64	Mixed-Use	1310 N. Cole Avenue	0	0	35
65	Mixed-Use at 6901 Santa Monica Boulevard	6901 Santa Monica Boulevard	0	0	22
66	Hyatt House Hotel & Retail	6611 W. Hollywood Boulevard	0	0	0
67	Apartments	2864 N. Cahuenga Boulevard	0	0	28
68	TAO Restaurant	6421 W. Selma Avenue	0	0	0
69	citizenM Hotel	1718 Vine Street	1	0	0
71	Sunset & Vine Mixed-Use	1538 N. Vine Street	0	15	30
72	Apartments & Retail	6758 W. Yucca Street	0	0	25
73	Restaurant & Multi-Purpose Entertainment Venue	6506 W. Hollywood Boulevard	0	0	0
75	Retail & Office Building	6904 W. Hollywood Boulevard	0	0	0
76	Residential Development	6001 W. Carlton Way	0	2	4
77	Hotel	6600 W. Sunset Boulevard	0	0	0
78	Apartments	7046 W. Hollywood Boulevard	0	0	4

<b>Map No.<sup>a</sup></b>	<b>Project Description</b>	<b>Address</b>	<b>Elementary School (K–6)<sup>b, c, d</sup></b>	<b>Middle School (6–8)<sup>b, c, d</sup></b>	<b>High School (9–12)<sup>b, c, d</sup></b>
80	Apartment & Retail	1201 N. La Brea Avenue	0	0	1
82	Mixed-Use	1222 N. La Brea Avenue	0	0	18
83	Mixed-Use	7113 W. Santa Monica Boulevard	0	0	17
84	John Anson Ford Theater	2580 Cahuenga Boulevard East	0	0	0
85	Hotel	6500 Selma Avenue	0	0	0
86	Hollywood Crossroads	1540-1552 Highland Avenue & others	0	0	95
87	Gas Station & Convenience Store	3704 N. Cahuenga Boulevard	0	0	0
88	Mixed-Use	3400 N. Cahuenga Boulevard	10	2	6
89	Condominium	3450 N. Cahuenga Boulevard	12	4	7
90	NBC Universal Evolution Plan	100 Universal City Plaza	51	26	32
91	Mixed-Use	7107 Hollywood Boulevard	68	18	39
92	5750 Hollywood	5750 Hollywood Boulevard	27	7	15
93	Wilcox Hotel	1717 Wilcox Avenue	1	0	0
94	Apartments and Office	1145 La Brea Avenue	5	1	3
95	Faith Plating	7134 Santa Monica Boulevard	24	7	14
96	Selma Hotel	6516 W. Selma Avenue	1	0	0
98	Highland Center Mixed-Use Project	1600 N Highland Avenue	0	0	23
99	Lanewood Apartments	7045 W Lanewood Avenue	0	0	4
101	Apartments	5460 W Fountain Avenue	0	0	7
102	Hollywood De Longpre Apartments	5632 De Longpre Avenue	0	8	17
104	Mixed-Use	1657 N Western Avenue	0	6	11
105	McCadden Campus (LGBT)	1118 N McCadden Place	0	0	19
107	Restaurant Expansion	1615 N Cahuenga Boulevard	0	0	0

Map No. <sup>a</sup>	Project Description	Address	Elementary School (K–6) <sup>b, c, d</sup>	Middle School (6–8) <sup>b, c, d</sup>	High School (9–12) <sup>b, c, d</sup>
108	Apartments	1749 Las Palmas Avenue	0	0	7
109	Mixed-Use	1868 N Western Avenue	17	5	10
110	6400 Sunset Mixed-Use	6400 Sunset Boulevard	0	0	22
111	Mixed-Use	1311 Cahuenga Boulevard	0	0	35
112	Gelson's Supermarket	1502 N Gardner Street	0	0	0
113	747 N Western Avenue	747 N Western Avenue	0	2	0
114	6630 W Sunset Boulevard	6630 W Sunset Boulevard	0	0	4
116	Sunset & Western	5420 W Sunset Boulevard	0	34	70
117	Hollywood & Wilcox	6430-6440 W Hollywood Boulevard	0	0	25
119	Mixed-Use	4914 W Melrose Avenue	0	2	4
121	Onni Group Mixed-Use Development	1360 N Vine Street	0	20	41
122	1600 Schrader	1600 Schrader Boulevard	0	0	0
123	Melrose & Beachwood	5570 W Melrose Avenue	0	2	0
124	Modera Argyle	1546 N Argyle Avenue	0	12	26
125	Montecito Senior Housing	6650 W Franklin Avenue	0	0	6
126	The Chaplin Hotel Project	7219 W Sunset Boulevard	0	0	0
127	Godfrey Hotel	1400 N Cahuenga Boulevard	0	0	0
128	6140 Hollywood	6140 Hollywood Boulevard	0	1	3
129	Selma - Wilcox Hotel	6421 W Selma Avenue	0	0	0
130	Apartments	1601 N Las Palmas Avenue	0	0	8
131	1723 N Wilcox Residential	1723 N Wilcox Avenue	0	0	6
133	Mixed-Use	1370 N St Andrews Place	0	1	1
134	7445 Sunset Grocery	7445 W Sunset Boulevard	0	0	0

Map No. <sup>a</sup>	Project Description	Address	Elementary School (K–6) <sup>b, c, d</sup>	Middle School (6–8) <sup>b, c, d</sup>	High School (9–12) <sup>b, c, d</sup>
135	7225 Sunset Mixed-Use	7225 W Sunset Boulevard	0	0	0
136	1719 Whitley Hotel	1719 N Whitley Avenue	0	0	0
137	1550 Wilcox Office	1550 Wilcox Avenue	0	0	0
	<b>Related Projects</b>		<b>410</b>	<b>497</b>	<b>1,505</b>
	<b>Proposed Project</b>		<b>29</b>	<b>7</b>	<b>16</b>
	<b>Total</b>		<b>439</b>	<b>504</b>	<b>1,521</b>

## NOTES:

<sup>a</sup> Corresponds with Map Nos. on Figure III-1 of this Draft EIR.

<sup>b</sup> Rounded to the nearest whole number. Therefore, totals may not sum exactly.

<sup>c</sup> Calculated by multiplying each of the proposed uses by its respective student generation rate issued by LAUSD. LAUSD has established student generation rates for residential (single-family detached and multi-family attached), retail and services, offices, research and development, industrial/warehouse/manufacturing, hospitals, hotels/motels, and parking structures.

<sup>d</sup> The attendance boundaries are not the same for all three levels of schools. A related project may be located within the attendance boundaries of the elementary school (Cheremoya Avenue Elementary School) but not within the attendance boundaries of the middle school (Joseph Le Conte Middle School). This was taken into consideration when conducting the calculations presented. A “-” symbol indicates the related project is not located within the schools’ identified attendance boundary.

<sup>e</sup> Related Project #38, Tutoring Center, proposes 100 school students. At this time, the age of the students is not determined. To be conservative, the 100 students were divided between the elementary school, middle school, and high school.

SOURCE: ESA, 2019.

**Table IV.K.3-5, *Projected Capacity and Enrollment of LAUSD Schools with Cumulative Development***, reports the effects of the cumulative student generation on projected enrollment, capacity, and seating at Cheremoya Avenue Elementary School, Joseph Le Conte Middle School, and Hollywood High School. Based on the 2021–2022 projected seating capacity estimates provided by LAUSD, the Cheremoya Avenue Elementary School would have a shortage of 416 seats (349 seats – 765 seats) or 436 seats less than the 20-seat safety factor with the addition of the Project’s students combined with the related projects’ students. The Joseph Le Conte Middle School would have a shortage of 842 seats (727 seats – 1,569 seats), or 862 seats less than the 20-seat safety factor with the addition of the Project’s students combined with the related projects’ students. Hollywood High School would have a shortage of 1,094 seats (1,496 seats – 2,590 seats), or 1,114 seats less than the 20-seat safety factor with the addition of the Project’s students combined with the related projects’ students.

The cumulative impacts of development on local schools as reported in Table IV.K.3-5 is likely overstated, however, since the estimated cumulative projected student generation for the related projects on which this analysis is based does not take into account the fact that many related projects may not be approved, or may not be constructed and occupied

within the timeframe analyzed, many of the related projects may be reduced in size, and many of the related projects may involve demolition of existing housing to accommodate the planned new development. Further, the future LAUSD enrollment estimates already account for some growth that may be inclusive of the related projects cited here. Finally, this cumulative analysis does not take into account the number of students who may choose to attend alternative schools, such as private, charter and magnet schools, which would also reduce attendance at LAUSD schools.

**TABLE IV.K.3-5  
PROJECTED CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS WITH CUMULATIVE  
DEVELOPMENT**

<b>School</b>	<b>Projected Capacity</b>	<b>Projected Enrollment Without Project and Related Projects<sup>a</sup></b>	<b>Projected Seating Overage/ (Shortage) without Project and Related Projects<sup>a</sup></b>	<b>Project + Related Projects Students</b>	<b>Projected Enrollment with Project + Related Projects</b>	<b>Projected Seating Overage/ (Shortage) With Project + Related Projects</b>
Cheremoya Avenue Elementary School (K–6)	349	326	23	439	765	(416)
Joseph Le Conte Middle School (6–8)	727	1,065	(338)	504	1,569	(842)
Hollywood High School (9–12)	1,496	1,069	427	1,521	2,590	(1,094)

<sup>a</sup> The “projected enrollment” and “projected seating” in these columns are without the Project or related projects.  
Source: ESA, 2019.

Based on the analysis, the Project in combination with the related projects could require new or expanded school facilities. However, 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<sup>29</sup> and the related projects, it would require speculation to determine currently how any future shortages would be addressed, including where and what those facilities may be. At such time as new or expanded school facilities are proposed by LAUSD, the environmental impacts of those facilities would be evaluated by LAUSD under CEQA as a project independent of the proposed Project.

<sup>29</sup> Rena Perez, Director, Los Angeles Unified School District, Facilities Services Division, Written Correspondence, July 11, 2017. (Appendix K to this Draft EIR.)

Furthermore, the Project and the related projects would be required to pay development fees for schools to LAUSD prior to the issuance of grading permits pursuant to SB 50. Pursuant to California Government Code Section 65995, the payment of developer fees would be considered full and complete mitigation of school impacts by the related projects. In addition, a portion of the property taxes generated by the Project and the related projects would be allocated by the State to LAUSD for future school operations. These monies would be in addition to LAUSD's bond program that funds improvements and upgrades to LAUSD school facilities. Therefore, the Project's incremental contribution towards school impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

#### **f) Mitigation Measures**

Project impacts regarding schools would be less than significant with the payment of development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Therefore, no mitigation measures are required.

#### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to schools would be less than significant without mitigation.

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## **IV. Environmental Impact Analysis**

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### **K.4. Public Services – Parks and Recreation**

#### **1. Introduction**

This section analyzes the potential construction and operational impacts of the Project on parks and recreational facilities. The analysis identifies and describes the existing parks and recreational facilities in the area, and evaluates the demand for park and recreational facilities generated by Project residents in light of the existing parks and recreational facilities and the recreational and open space facilities to be provided as part of the Project. The analysis also evaluates the Project's consistency with applicable City goals and regulatory requirements. Information regarding existing service ratios, as well as the existing parks and recreational facilities that would serve the Project, was provided in part by the Los Angeles Department of Recreation and Parks (LADRP), which is included in Appendix K of this Draft EIR.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

##### **(1) State of California**

##### **(a) *Quimby Act***

Section 66477 of the California Government Code, 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 3 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 3 acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. Los Angeles Municipal Code (LAMC) Section 17.12, Park and Recreational Facility Requirements, was authorized to support compliance with the Quimby Act and provides a mechanism for increasing the park and recreational facilities available for the City's

residents. Effective January 11, 2017, LAMC Section 17.12 was amended and incorporated into LAMC Section 12.33, Parks Fees and Land Dedication. The prior LAMC Section 17.12 and recently amended LAMC Section 12.33 are discussed further below.

## (2) Local

### (a) *City of Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element states that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreational facilities throughout the City; and (3) a full complement of park and recreational facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users.<sup>1</sup> Facilities should be provided at the neighborhood, community, and regional levels.

### (b) *City of Los Angeles General Plan Open Space Element*

The Open Space Element of the City's General Plan 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.<sup>2</sup> This document distinguishes open space areas as privately or publicly owned, and includes goals, objectives, policies, and programs directed toward the regulation of privately owned lands both for the benefit of the public as a whole, and for the 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 the development 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.<sup>3</sup>

The City's General Plan Open Space Element update was formally initiated pursuant to a City Council motion adopted on May 24, 2001 (City Council File 96-1358) and has been undergoing revisions by the Department of City Planning.<sup>4,5</sup> During April through June

<sup>1</sup> City of Los Angeles, General Plan Framework, Chapter 9 – Infrastructure and Public Services, Recreation and Parks, Goal 9L, <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>.

<sup>2</sup> City of Los Angeles City Planning Department, Open Space Plan, June 1973. Available at: [https://planning.lacity.org/Code\\_Studies/GeneralElement/openspaceelement.pdf](https://planning.lacity.org/Code_Studies/GeneralElement/openspaceelement.pdf). Accessed August 29, 2019

<sup>3</sup> Ibid.

<sup>4</sup> Office of the City Clerk, City of Los Angeles, Council File Number: 96-1358, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=96-1358>, accessed July 2018.

<sup>5</sup> City of Los Angeles City Planning Department, General Plan Structure, Summary of the General Plan Structure, Spring 2014. Available at: [https://planning.lacity.org/Code\\_Studies/GeneralElement/Summarygp.pdf](https://planning.lacity.org/Code_Studies/GeneralElement/Summarygp.pdf). Accessed August 29, 2019.

2017, the Department of City Planning convened four meetings of an Open Space Working Group for OurLA2040, the City's update to the General Plan. This group included open space practitioners who focused on four topics: Parks and Recreation, Wildlands, Waterways and Beaches, and Connections. As the update to the Open Space Element is underway, key preliminary themes have since been identified:<sup>6</sup>

- Create a network of interconnected urban open spaces and green infrastructure
- Capitalize on opportunities to repurpose existing land for parks
- Strategically invest in improving equity and access to parks
- Promote citizen education, involvement, and stewardship
- Identify opportunities for climate-smart open space investments that deliver multiple environmental benefits

In conjunction with the working group meetings, an Open Space Vision Survey has been released to the public and will provide feedback that will be incorporated into the guiding principles for the Open Space Element. Additional Citywide workshops were held throughout 2017 and in February 2018.<sup>7</sup>

Until approval of the pending updates to the Open Space Element, the LADRP is operating under the guidance of the Public Recreation Plan, a portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan. The guidelines of the Public Recreation Plan are described below.

*(c) City of Los Angeles General Plan Public Recreation Plan*

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreational facilities, and open space areas in the City. Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreational sites, including community buildings, gymnasiums, swimming pools, and tennis courts.<sup>8</sup> To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radii and projected population levels.

<sup>6</sup> City of Los Angeles City Planning Department, OurLA2040, City of Los Angeles' General Plan Update, Open Space Working Group Summary, August 2017. Available at: [https://www.ourla2040.org/sites/default/files/PC1\\_Los\\_Angeles\\_General\\_Plan\\_Overview\\_FEB2017.pdf](https://www.ourla2040.org/sites/default/files/PC1_Los_Angeles_General_Plan_Overview_FEB2017.pdf). Accessed August 29, 2019.

<sup>7</sup> City of Los Angeles, OurLA2040 Past Events. Available at: <https://planning.lacity.org/plans-policies/community-plan-update/boyle-heights-community-plan-update#events>. Accessed September 2019.

<sup>8</sup> City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980, [https://planning.lacity.org/Code\\_Studies/GeneralElement/PublicRecreationPlan.pdf](https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf).

The PRP identifies multiple park types based on size, type, intended users, and service radius size. Regional parks are ideally greater than 50 acres in size, 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 serving several neighborhoods (e.g., playfields, courts, swimming pools, etc.), and have a service radius of 2 miles. Neighborhood parks are ideally 5 to 10 acres in size, are intended to serve residents of all ages in its immediate neighborhood (playfields, turfing picnic areas, etc.), are pedestrian-accessible without crossing a major arterial street or highway/freeway, and have a service radius of 1 mile. Pocket parks and specialty parks are ideally 0.5 acres in size, intended to serve a school or immediate surroundings, and have a service radius of approximately 0.5 miles.<sup>9</sup>

The PRP also states that the allocation of acreage for community and neighborhood parks should be based on the resident population within a park's service radius. The PRP identifies the Citywide goals of 1 acre each of neighborhood and community parkland per 1,000 persons in the short/ intermediate term, and 2 acres each of neighborhood and community parkland per 1,000 persons in the long-term.<sup>10</sup> However, to determine existing service ratios, the LADRP commonly uses the geographic area covered by the applicable Community Plan rather than the park service radius.<sup>11</sup> It is important to note that the PRP guidelines are Citywide goals and do not establish requirements for individual development projects.

(d) *Los Angeles Department of Recreation and Parks (LADRP)  
Citywide Community Needs Assessment*

In 2009, LADRP commissioned the first assessment of existing City parks and recreational facilities since 1999, as a preliminary step in developing a Citywide park master plan and five-year capital improvement plan. 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 recreational facilities. The report provides a more current assessment of conditions and future needs than the General Plan's PRP. Based on the existing supply of parks and recreational facilities, and the estimated population within the City as of 2009, the Citywide Community Needs Assessment recommends service levels of 9.60 acres of park lands per 1,000 persons Citywide, including (per 1,000 persons) 0.10 acres of mini-parks (i.e., parks less than 1 acre in size), 1.50 acres of neighborhood parks, 2 acres of community parks, and 6 acres of regional and large urban parks.<sup>12</sup> Similar to the PRP, the Needs Assessment

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

<sup>12</sup> City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, <http://www.laparks.org/sites/default/files/projects/2009%20Community%20Needs%20Assessment%20-%20Final.pdf>, accessed July 2018.

recommends service levels, but does not establish requirements for individual development projects.

(e) *Los Angeles Municipal Code*

(i) *LAMC Sections 12.21 and 12.21.G (Usable Open Space Requirements)*

Section 12.21 of the LAMC identifies open space requirements for projects and defines usable open space for the purpose of meeting the requirements. 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, children's play 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 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. No more than 50 square feet per dwelling unit can be counted towards the total required usable open space..<sup>13</sup>

LAMC Section 12.21.G 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.

(ii) *LAMC Section 17.12 (Park and Recreational Facility Requirements)*

LAMC Section 17.12, authorized under the Quimby Act and formerly comprising the City's "Quimby Code," required developers of subdivisions to dedicate land and/or pay in-lieu fees for parks and recreational facilities. Under prior LAMC Section 17.12, the area of land within a residential subdivision that was required to be dedicated for park and recreational uses was determined by the maximum residential density at which the land could or would be developed. Dedication requirements ranged from 0.9 percent for subdivisions with a net density of one dwelling unit per acre to 32 percent for subdivisions

<sup>13</sup> The Project's application for vested development has been deemed complete and is exempt from the recently amended LAMC Section 12.33, Parks Fees and Land Dedication, which became effective January 11, 2017. As such, the project is required to comply with the prior LAMC Section 17.12, Park and Recreational Facility Requirements (City of Los Angeles Department of Recreation and Parks. Park Fees. Available at: <https://www.laparks.org/planning/park-fees>. Accessed February 2020).

with a net density of 100 dwelling units per acre. Land dedication and in-lieu fee payment were subject to the restrictions set forth in LAMC Section 17.12 (i.e., land must be used for park or recreational uses and fees must be used for the acquisition or development, not operation or maintenance of, park land).

LAMC Section 17.12.F allowed private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement. Recreational areas that qualified under this provision of Section 17.12 included, in part, indoor recreational areas, gym, swimming pools and spas (when the spas are an integral part of a pool complex). Furthermore, in accordance with LAMC Section 17.12.F.1, the recreational areas proposed as part of a project had to 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. For the reasons explained below, the terms of LAMC Section 17.12 apply to the Project.

*(iii) Recently Amended LAMC Section 12.33 (Park Fees and Land Dedication)<sup>14</sup>*

Section 12.33, Park Fees and Land Dedication, of the LAMC, authorized under the Quimby Act and currently comprising the City's "Quimby Code," requires developers of residential subdivisions to dedicate land and/or pay in-lieu fees for parks and recreational facilities. As amended, it became effective January 11, 2017. Under LAMC Section 12.33.D, Residential Subdivision Projects That Contain More Than 50 Dwelling Units, the area of land within a residential subdivision that is required to be dedicated for park and recreational uses is determined by the formulas provide therein. Land dedication and in-lieu fee payment are subject to the restrictions set forth in LAMC 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). As explained below, the Project is exempt from this recently amended section.

*(iv) LAMC Section 12.33.H (Credits)*

Section 12.33.H, Credits, of the LAMC, allows private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement. Recreational areas that qualify under this provision of 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, as under Section 17.12.F.1, 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

<sup>14</sup> Discussion of the recently amended LAMC Section 12.33 is for informational purposes only as the Project was deemed complete prior to the January 11, 2017 effective date of the amended ordinance, and is therefore not subject to the new requirements.

satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities. As explained below, the Project is exempt from this recently amended section.

(v) *LAMC Section 21.10.3 (Dwelling Unit Construction Tax)*

LAMC Section 21.10.3, Dwelling Unit Construction Tax, establishes the payment of a dwelling unit construction tax of \$200 per new residential unit. The tax is to be paid to a "Park and Recreational Sites and Facilities Fund" for the acquisition and development of park and recreational sites and facilities. If park and recreation provisions (i.e., fees, improvements, or land dedication) have been provided pursuant to LAMC Section 12.33, the fair market value of those provisions is credited against the payment of this tax. For the reasons explained below, the terms of LAMC Section 21.10.3 apply to the Project.

(f) *Hollywood Community Plan*

The 1988 Hollywood Community Plan includes the following Objective 5 objective and five policies relevant to parks and recreation:

Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development to encourage open space and parks in both local neighborhoods and in high density areas.

It is the City's policy:

1. That the desires of the local residents be considered in the planning of recreational facilities.
2. That recreational facilities, programs and procedures be tailored to the social, economic, and cultural characteristics of individual neighborhoods and that these programs and procedures be continually monitored.
3. That existing recreational sites and facilities be upgraded through site improvements, rehabilitation and reuse of sound structures, and replacement of obsolete structures, as funds become available.
4. That, in the absence of public land, and where feasible, intensified use of existing facilities for recreational purposes be encouraged.
5. That the expansion of existing recreational sites and the acquisition of new sites be planned so as to minimize the displacement of housing and the relocation of residents.

to address the provision of recreational and parks facilities.<sup>15</sup>

<sup>15</sup> Hollywood Community Plan, December 13, 1988. Available at: <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed August 29, 2019.

## b) Existing Conditions

The LADRP is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Los Angeles. These facilities include parks, swimming pools, public golf courses, recreational centers, museums, youth camps, tennis courts, sports fields, sports programs, and programs for senior citizens. The LADRP also supervises construction of new facilities and improvements to existing ones. Currently, the LADRP 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, 9 dog parks, 187 summer youth camps and help support the Summer Night Lights gang reduction and community intervention program. The LADRP 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 LADRP oversees Griffith Park and operates Venice Beach, Cabrillo Marine Aquarium, and 12 museums.<sup>16</sup>

The adequacy of parkland is typically measured in terms of acres per 1,000 residents.<sup>17</sup> The City has an estimated existing Citywide ratio of 0.76 acres of neighborhood and community parkland per 1,000 residents.<sup>18</sup> The Hollywood Community Plan area has a ratio of 0.41 acres of neighborhood and community parkland per 1,000 residents.<sup>19</sup> The existing ratio of neighborhood and community parks within the Hollywood Community Plan area does not meet the City's short-range standards under the PRP of 1 acre per 1,000 persons within a 1-mile service radius for neighborhood parks or 1 acre per 1,000 persons within a 2-mile radius for community parks, nor do they meet the intermediate standards of 2 acres per 1,000 persons.<sup>20</sup>

According to the LADRP, the Project Site is located in a heavily populated area in which there are high numbers of youth, families, and seniors utilizing local parks and recreational facilities. Although data is not available regarding the level of use of the recreational facilities that serve the Project Site, the parks within the surrounding community are heavily utilized and often overburdened.<sup>21</sup> The LADRP has identified the following neighborhood parks as serving the Project Site: Selma Park, which is a pocket park; De Longpre Park; Hollywood Recreation Center; Las Palmas Senior Citizen

<sup>16</sup> Los Angeles Department of Recreation and Parks website, "Who We Are." Available at: <https://www.laparks.org/departments/who-we-are>. Accessed July 2018.

<sup>17</sup> City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980, [https://planning.lacity.org/Code\\_Studies/GeneralElement/PublicRecreationPlan.pdf](https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf).

<sup>18</sup> Michael A. Shull, General Manager and Ramon Barajas, Assistant General Manager, Los Angeles Department of Recreation and Parks, written correspondence dated November 25, 2015. (Appendix K to this Draft EIR)

<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

<sup>21</sup> Michael A. Shull, General Manager and Ramon Barajas, Assistant General Manager, Los Angeles Department of Recreation and Parks, written correspondence dated November 25, 2015. (Appendix K to this Draft EIR)



Center; and Yucca Community Center. Community Parks serving the Project would include Barnsdall Art Park Recreation Center and Wattles Garden and regional parks serving the Project would include Runyon Canyon and Griffith Park.<sup>22</sup> Existing parks and recreational facilities in the Project Site area are summarized below in **Table IV.K.4-1, Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site**, and existing park locations are shown in **Figure IV.K.4-1, Parks and Recreational Facilities Located in the Vicinity of the Project Site**. Five of these parks and recreational facilities are located within a one-mile radius of the Project Site, three are located within a 2-mile radius of the Project Site, and Griffith Park is located approximately 2.75 miles from the Project Site.

**TABLE IV.K.4-1  
EXISTING PARKS AND RECREATIONAL FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE**

<b>Name and Address<sup>a</sup></b>	<b>Distance/ Direction from Project Site<sup>b</sup></b>	<b>Type of Park</b>	<b>Size (acres)</b>	<b>Amenities</b>
Selma Park 6567 West Selma Avenue	0.50 miles southwest	Pocket	0.22	Children's play area.
Yucca Community Center 6671 West Yucca Street	0.57 miles west	Neighborhood	1.0	Soccer field (unlighted), basketball courts (lighted/ outdoor), children's play area, picnic table
Las Palmas Senior Citizen Center 1820 North Las Palmas Avenue	0.63 miles west	Neighborhood	1.14	Auditorium, community room, shuffle board court, stage
De Longpre Park 1350 North Cherokee Avenue	0.75 miles southwest	Neighborhood	1.37	Children's play area, benches, Rudolph Valentino Monument
Hollywood Recreation Center 1122 North Cole Avenue	0.83 miles south	Neighborhood	3.12	Auditorium, community room, basketball courts (lighted/ outdoor), children's play area
Runyon Canyon Park 2000 North Fuller Avenue	1.40 miles west	Regional	136.76	Children's play area, hiking trail, off-leash dog area
Barnsdall Art Park Recreation Center 4800 West Hollywood Boulevard	1.64 miles east	Community	14.59	Barnsdall Art Center, gallery theatre, hollyhock house, junior art center, municipal art gallery
Wattles Garden Park 1824 North Curson Avenue	1.70 miles west	Community	47.58	Mansion, tea house, stream/ brook, hiking trails, community garden, Japanese garden

<sup>22</sup> Michael A. Shull, General Manager and Ramon Barajas, Assistant General Manager, Los Angeles Department of Recreation and Parks, written correspondence dated November 25, 2015. (Appendix K to this Draft EIR)

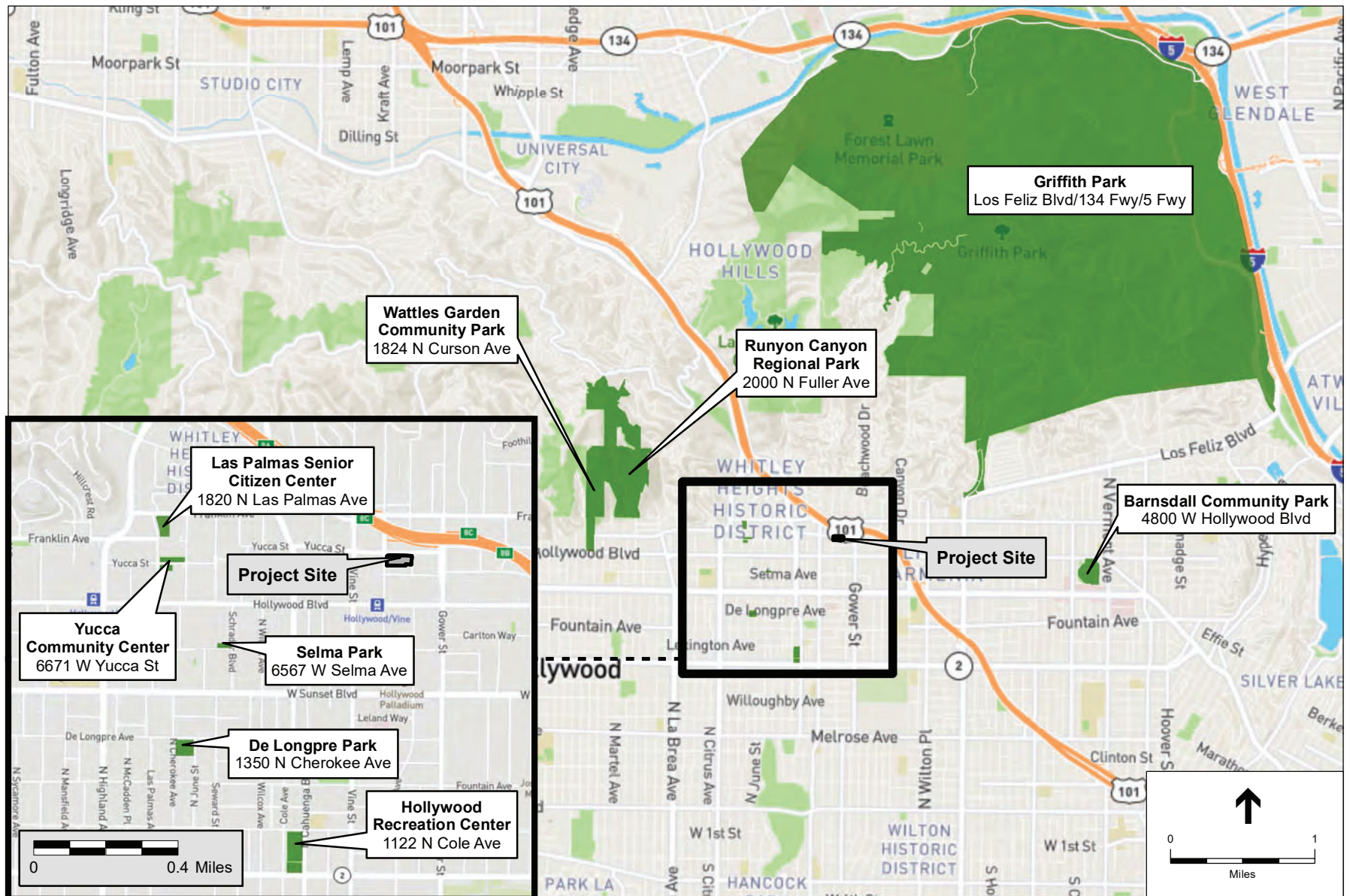
<b>Name and Address<sup>a</sup></b>	<b>Distance/ Direction from Project Site<sup>b</sup></b>	<b>Type of Park</b>	<b>Size (acres)</b>	<b>Amenities</b>
Griffith Park Los Feliz Boulevard/134 Fwy/ 5 Fwy	2.75 miles northeast	Regional	4,282	Autry National Center, Los Angeles Zoo, Griffith Park Equestrian Center, Los Angeles Live Steamers Museum and Travel Town Transportation Museum, Central Service Yard, Wilson and Harding Golf Courses, Los Feliz Golf Course, North Atwater Park, the Boy's Camp, Hollywood and Girl's Camp, Friendship Hall, Old Zoo, Park Center, Greek Theatre, Bird Sanctuary, the Observatory, Pollwog, hiking trails, jogging, horseback riding, tennis, soccer, swimming, camping, bridge trails, lawn areas, picnic areas.

**NOTES:**

<sup>a</sup> These facilities were identified by the LADRP as directly serving the Project Site.

<sup>b</sup> Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

SOURCES: Michael A. Shull, General Manager and Ramon Barajas, Assistant General Manager, Los Angeles Department of Recreation and Parks, written correspondence dated November 25, 2015. City of Los Angeles Recreation and Parks, <https://www.laparks.org/parks>, <https://www.laparks.org/reccenter>, and <https://www.laparks.org/scc>, accessed July 2018.



SOURCE: Open Street Map 2017.

6220 West Yucca Project

**Figure IV.K.4-1**

Parks and Recreational Facilities Located in the Vicinity of the Project Site

### 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 parks and recreation facilities if it would:

#### XIV. Public Services

***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;***

#### XV. Recreation

***Threshold (a): 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 (b): Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.***

In assessing the Project's potential impacts related to parks and recreation facilities in this section, the City has determined to use these Appendix G checklist questions as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing significance under these thresholds:

- The net population increase resulting from the 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; and
- 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 the Project's parks and recreation impacts is based on an estimate of the size of its residential population and the size and type of its open space components that serve its residents and visitors, and thereby reduce the Project's potential impacts on local

park facilities. The Project's estimated population and its facilities were converted to a service ratio expressed as acres of parkland per 1,000 residents. The ratio was then compared to existing service ratios within the Hollywood Community Plan area and Los Angeles as a whole, as well as service standards set forth by the City's Quimby Act provisions, the PRP, and the LAMC. The Project's application for vested development was deemed complete prior to January 11, 2017, and, therefore, is exempt from the recently amended LAMC Section 12.33, Parks Fees and Land Dedication, which became effective January 11, 2017. As such, the Project is required to comply with the previous LAMC Section 17.12, which was effective prior to the January 11, 2017, amendment. LAMC Section 12.21.G, Usable Open Space Requirements and LAMC Section 21.10.3, Dwelling Unit Construction Tax, have not been recently amended and, therefore, apply to the Project.

Overall, the Project would be subject to review under, and compliance with, LAMC Section 12.21.G, LAMC Section 17.12 (prior to the January 11, 2017, amendment), and LAMC Section 21.10.3. LAMC Section 12.21.G prescribes minimum open space requirements for new residential development. LAMC Section 17.12 requires residential projects seeking the division of land or a zone change to dedicate land for public parks and/or pay in-lieu fees for new parks. New recreational and open space facilities provided within the subdivision are credited against the total requirements established therein. LAMC Section 21.10.3 establishes the payment of a dwelling unit construction tax per new residential unit. The analysis addresses consistency of the Project with the requirements of these regulations and the role of the regulations in reducing potential Project impacts. The analysis also addresses potential impacts on park facilities that might occur due to construction activities.

### **c) Project Design Features**

There are no Project Design Features that relate to parks and recreation.

### **d) Analysis of Project Impacts**

***Threshold (a): (Public Services) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks?***

***Threshold (a): (Recreation) 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?***

***Threshold (b): (Recreation) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

**(1) Construction**

The nearest parks to the Project Site are located at least 0.5 miles away. These parks are not located along major streets that would provide access to Project-related construction activities and equipment. The distance between each of these parks and the construction activities at the Project Site would avoid potential noise impacts and conflicts with construction worker activities. Therefore, Project construction would not result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project Site vicinity.

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. A few construction workers may visit a park to eat lunch or for recreation after a day of work. However, construction workers are temporary employees with high turnover rates associated with the various phases of construction. Therefore, such park use would be rare. Moreover, with 44 residences currently on the Project Site, the number of construction worker park visits would not be expected to increase compared to park visits by existing residents. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project Site vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

Thus, based on the above, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. **Construction of the Project would not cause or accelerate substantial physical deterioration of off-site public parks and recreational facilities, and would not create demand that would necessitate the provision of new or physically altered facilities, the construction of which would cause significant adverse physical impacts. Therefore, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures are not required.**

**(2) Operation**

The Project would increase the number of residential units at the Project Site by 166 residential units as compared to existing conditions, and would increase the residential

population by approximately 403 residents. It is conservatively assume that these residents would create new demand on parks and recreational space in the Project Site area.<sup>23</sup> However, the Project includes on-site recreational facilities and open space features that would serve Project residents and hotel guests and would thereby reduce Project demand on public parks. Building 1 would include a 10,610-square-foot podium courtyard (Level 4); a 3,740-square-foot pool/roof garden (Level 20); 8,500 square feet of private residential balconies; a 1,320-square-foot spa facility for hotel guests only (Level 4); a 2,530-square-foot gym with adjacent outdoor synthetic lawn/workout space, and a pool and spa deck (Level 4). The podium courtyard would be equipped with lounge seats, a game lounge, gas fire pit and lounge, BBQ, and dining tables and chairs. Building 2 would include a 375-square-foot, indoor amenity space. Therefore, the Project's addition of 166 residential units to the existing condition is estimated to generate approximately 403 net new residents, who would require 1.61 acres<sup>24</sup> of parkland to meet the PRP's Citywide long-range standard of 4 acres per 1,000 residents and 0.81 acres<sup>25</sup> to meet the PRP's more attainable Citywide short- and intermediate- range standard of 2 acres per 1,000 persons.<sup>26</sup> The Project would provide approximately 26,880 square feet (0.62 acres) of open space and private recreational amenities, which can be counted toward the PRP's open space standards, but would not provide any on-site public parkland. As previously stated, however the PRP contains Citywide standards, not requirements for individual projects. Thus, although the Project would not meet the PRP's Citywide short- or long-range standards of 2 or 4 acres per 1,000 residents, respectively. Therefore, the intent of the PRPs parkland standards would be met through compliance with State Law as enforced through LAMC requirements related to the provision and/or funding of parks and recreation spaces. Such requirements include the provision of on-site open space (discussed below), payment of Dwelling Unit Construction Tax, and compliance with the City's Quimby Ordinance requirements.

Moreover, as noted above, given that the Project's recreational facilities are located on site and are tailored to meet the needs of the particular on-site population, it is expected that the majority of the Project's recreational demand would be satisfied by the facilities within the Project Site. Residual off-site park usage would likely be dispersed to a large number of parks. Primarily, Project residents may visit Runyon Canyon or Griffith Park, which are regional facilities and easily accessible from the Project Site. Beyond that, Project park visits would likely be distributed among a number of the seven other parks serving the Project Site area (one pocket part within a half-mile radius of the Project Site, four

<sup>23</sup> The average household size is 2.43 persons per household based on the 2016 American Community Survey 5-year average estimate (2012-2016). Therefore, project's 210 dwelling units is estimated to generate a direct population increase of approximately 510 new people. However, the existing 44 residential units is estimated to result in an existing population of approximately 107 existing people. Overall, the project is estimated to result in a net increase of 166 dwelling units and approximately 403 people on the site when compared to existing conditions (510 new people – 107 existing people = 403).

<sup>24</sup>  $403 \text{ residents} \div 1,000 \text{ persons} = 0.403 \times 4 \text{ acres} = 1.61 \text{ acres of parkland.}$

<sup>25</sup>  $403 \text{ residents} \div 1,000 \text{ persons} = 0.403 \times 2 \text{ acres} = 0.81 \text{ acres of parkland.}$

<sup>26</sup> City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980, [https://planning.lacity.org/Code\\_Studies/GeneralElement/PublicRecreationPlan.pdf](https://planning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf).



neighborhood parks within a one-mile radius of the Project Site, and two community parks within a 2-mile radius of the Project Site) as there are multiple parks at a variety of locations that would be accessible with unique features at one park or another that may be of interest to different site residents. Therefore, the impacts at any single park location would be small, and the Project's contribution to park use would not cause substantial degradation of existing facilities or require a new public park. Accordingly, with compliance with the regulatory provisions of the LAMC, which require the dedication of parkland, payment of in-lieu fees (if determined necessary by the City), or provision of comparable on-site recreational facilities, the Project would be consistent and not conflict with the PRP.

(i) *Community-Wide Needs Assessment*

The City's 2009 Community-Wide Needs Assessment provides more recent standards for the provision of park space. This document recommends Citywide service levels of 9.60 acres of park lands per 1,000 persons, including (per 1,000 persons) 0.10 acre of mini-parks, 1.50 acres of neighborhood parks, 2 acres of community parks, and 6 acres of regional and large urban parks.<sup>27</sup> Under these Citywide service levels, the Project's estimated 403 net new residents would require 0.04 acres<sup>28</sup> of mini-parks, 0.60 acres<sup>29</sup> of neighborhood parks, 0.81 acres<sup>30</sup> of community parks, and 2.42 acres<sup>31</sup> of regional and large urban parks per 1,000 persons to meet the Citywide Community-Wide Needs Assessment recommended service levels.

As stated above, the Project would not provide any on- or off-site public parkland, although the Project would include on-site recreational facilities and open space features that would serve Project residents and hotel guests. Thus, the Project would not meet the Citywide Community-Wide Needs Assessment recommended service levels of 0.04 acres of mini-parks, 0.60 acres of neighborhood parks, 0.81 acres of community parks, and 2.42 acres of regional and large urban parks per 1,000 persons. However, these recommended service levels are not requirements for individual projects. Further, the Project would be subject to, and would comply with, the regulatory provisions of the LAMC which require the dedication of parkland and/or payment of in-lieu fees. Moreover, as discussed above, it is anticipated that most Project residents would more frequently use on-site open space and recreational facilities rather than off-site public parks and recreational facilities due to their convenience and proximity. As such, the Project's provision of on-site open space and recreational facilities would reduce the use of area parks by Project residents.

Nonetheless, some Project residents would still be expected to utilize other private or public recreational facilities, including nearby public park amenities such as picnic areas, tennis

<sup>27</sup> City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, <http://www.laparks.org/sites/default/files/projects/2009%20Community%20Needs%20Assessment%20-%20Final.pdf>, accessed July 2018.

<sup>28</sup>  $403 \text{ residents} \div 1,000 \text{ persons} = 0.403 \times 0.10 \text{ acres} = 0.04 \text{ acres of min-parks.}$

<sup>29</sup>  $403 \text{ residents} \div 1,000 \text{ persons} = 0.403 \times 1.5 \text{ acres} = 0.60 \text{ acres of neighborhood parks.}$

<sup>30</sup>  $403 \text{ residents} \div 1,000 \text{ persons} = 0.403 \times 2 \text{ acres} = 0.81 \text{ acres of community parks.}$

<sup>31</sup>  $403 \text{ residents} \div 1,000 \text{ persons} = 0.403 \times 6 \text{ acres} = 2.42 \text{ acres of regional and large urban parks.}$



courts, basketball courts and sports fields. As a result, the Project would result in some incremental increase in the use of area public parks and recreational facilities. However, as discussed above, the use of off-site parks and recreational facilities by Project residents would likely be dispersed among the multiple parks in the Project Site vicinity. The impacts at any single park location would be small and the Project's contribution to park use would not cause substantial degradation of existing facilities or require a new public park. Accordingly, with compliance with the regulatory provisions of the LAMC, which require the dedication of parkland, payment of in-lieu fees, or provision of comparable on-site recreational facilities, the Project would be consistent and not conflict with this Assessment.

(b) *Hollywood Community Plan*

The Project would support the objectives and policies of the Hollywood Community Plan through the provision of on-site open space, recreational amenities, and landscaping, as discussed above, which would offset the demand that would be generated by Project residents for public parks and recreational facilities in the Community Plan area. In the absence of public land in the surrounding high-density area, the Project would provide recreational sites and facilities for its residents. To assist in coordinating the phasing of public facilities with private development, the Project would provide open space for its residents, and a publicly accessible retail plaza, within a highly urbanized area. In addition, as suggested in the Community Plan, these recreational sites and facilities would be developed as sound structures and not need upgrading or rehabilitation. The Project would also use its facility to provide open space for its residents with amenities that, as addressed by the Hollywood Community Plan, would be tailored to the social, economic, and cultural characteristics of the neighborhood. In addition, Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Community Plan area. As such, impacts with respect to consistency with the Hollywood Community Plan would be less than significant.

(c) *Los Angeles Municipal Code*

(i) *Open Space Requirements (LAMC 12.21.G)*

Under the LAMC, there are a number of requirements that must be met for project facilities to be credited as open space. **Table IV.K.4-2, Code-Required Open Space**, illustrates the open space requirements of LAMC Section 12.21.G. Pursuant to LAMC Section 12.21.G, the Project would be required to provide a minimum of 175 square feet of usable open space area per dwelling unit for units with more than three habitable rooms, 125 square feet for units with three habitable rooms, and 100 square feet for units with less than three habitable rooms. Applying these standards to the Project's unit mix results in a requirement for 24,150 square feet (0.55 acres) of usable open space. Of this amount, at least 50 percent (12,075 square feet or 0.28 acres) must be common open space area. Of the 12,075 square feet of common open space required, a minimum of 25 percent (3,019 square feet or 0.069 acre) must be planted with ground cover, shrubs, or trees. Indoor recreation amenities can account for up to 25 percent of the usable open space requirements. Private open space is 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. No more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

**TABLE IV.K.4-2  
CODE REQUIRED OPEN SPACE**

<b>Proposed Residential Units</b>	<b>Quantity (units)</b>	<b>Factor (sf/unit)<sup>a</sup></b>	<b>Open Space Requirement</b>
<b>Building 1:</b>			
One Bedroom	99 units	100	9,900 sf
Two Bedroom	88 units	125	11,000 sf
Suite	10 units	175	1,750 sf
<i>Subtotal</i>	<i>197 units</i>		<i>22,650 sf</i>
<b>Building 2:</b>			
One Bedroom	5 units	100	500 sf
Two Bedroom	8 Units	125	1,000 sf
<i>Subtotal</i>	<i>13 units</i>		<i>1,500 sf</i>
<b>Total Open Space</b>			<b>24,150 sf</b>

**NOTES:**

The calculations are based on the currently proposed unit mix. This mix is considered to provide a conservative analysis as an increase in the amount of larger units that would require more open space would result in a reduction of the total amount of units, thus reducing the amount of open space required. In any case, final development.

<sup>a</sup> Factors from LAMC Section 12.21-G.

SOURCE: ESA, 2019.

**Table IV.K.4-3, *Project Open Space***, summarizes the open space that would be provided by the Project. As shown in Table IV.K-3, the Project would include 26,880 square feet (0.62 acres) of total open space, including 8,750 square feet of private residential balconies (175 private balconies of at least 50 square feet), 10,610 square feet of podium courtyard, 4,615 square feet of outdoor open space amenities (roof gardens), and 2,905 square feet of indoor open space amenities (2,530-square-foot gym with adjacent outdoor synthetic lawn/workout space and 375-square-foot amenity space). This amount of space exceeds the requirement for 24,150 square feet (0.55 acres) of usable open space by 2,730 square feet (0.06 acres). The Project provides 18,130 square feet (0.42 acres) of common open space (indoor recreational amenities and outdoor open space amenities).<sup>32</sup> As such, the Project exceeds the requirement for 12,075 square feet (0.28 acres) of common open space area by 6,055 square feet (0.14 acres).

<sup>32</sup> This total excludes the private balconies and rear yards). (Indoor Recreational Amenities: gym + indoor amenity space = 2,905 square feet) + (Outdoor Open Space Amenities: podium courtyard and roof gardens = 15,225 square feet) = 18,130 square feet.

**TABLE IV.K.4-3  
PROJECT OPEN SPACE**

	<b>Building 1</b>	<b>Building 2</b>	<b>Total (Across Project Site)</b>
Outdoor Common Open Space	14,350 sf	875 sf	15,225 sf
Indoor Common Open Space	2,530 sf	375 sf	375 sf
Private Open Space (Balconies)	8,500 sf	250 sf	8,750 sf
<b>Total Open Space Provided</b>	<b>25,380 sf</b>	<b>1,500 sf</b>	<b>26,880 sf</b>
<b>Total Open Space Required</b>	<b>22,650 sf</b>	<b>1,500 sf</b>	<b>24,150 sf</b>

SOURCE: ESA, 2019.

Landscaping would be provided throughout the Project Site, including street trees along adjacent roadways, internal shade trees, ground cover, shrubs, and planter boxes; refer to Figures II-13, Landscape Plan, in Chapter II, *Project Description*, of this Draft EIR, for a conceptual illustration of the site plan with proposed landscaping. Approximately 34 percent (or 5,225 square feet) of the outdoor common open space, which totals approximately 15,225 feet, would be planted with ground cover, shrubs, or trees, which would exceed the requirement that 25 percent (3,806 square feet) of outdoor common open space to be planted. Lastly, the Project provides 2,905 square feet of indoor recreational amenities which accounts for 11 percent of the usable open space but does not exceed the indoor recreation amenity maximum of 25 percent.

Based on above, the Project would meet the useable open space and landscape requirements of LAMC Section 12.21.G. Therefore, the Project complies with the LAMC on-site open space requirements.

*(ii) Parkland Requirements (LAMC 17.12 and 21.10.3)*

As previously discussed, LAMC Section 17.12 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 could or would be developed. The Project would include the development of 210 units or 166 net new residences on the 1.16-acre Project Site, resulting in a residential density of 181 units per acre. Based on this residential density (greater than 100 units per acre) and the residential density-based sliding scale of LAMC Section 17.12, 32 percent (0.37 acres) of the Project Site would be required to be dedicated to the City (or pay equivalent in-lieu fees) for parkland and recreational facilities.

The Project would not include the dedication of any portion of the Project Site to the City for parks and recreational facilities. However, LAMC Section 17.12.F permits privately-held park 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 park and recreational facilities are available for use by all Project residents. As described above,

the Project proposes to include 26,880 square feet (0.62 acres) of total Project recreation and open space amenities, 18,130 square feet (0.42 acres) of which would be available for use by all Project residents. Therefore, the Project would meet the parkland requirements of LAMC Section 17.12. Although not anticipated, should any portion of the Project's common open space/recreational areas not be credited toward the Project's land dedication requirements, the Project would be required to pay in-lieu fees as determined by the City to comply with LAMC Section 17.12.

As previously discussed, LAMC Section 21.10.3 sets a dwelling unit construction tax of \$200 for each new residential unit for City acquisition of new park space. As the Project Applicant would pay the \$200 tax, the Project would be consistent with LAMC Section 21.10.3 dwelling unit construction tax requirements.

Based on the above, with its proposed on-site open space and recreational facilities, the Project would be consistent with LAMC open space and parkland requirements under LAMC Sections 17.12 and 21.10.3.

The Project has incorporated recreational facilities within the Project itself. Those recreational facilities would not cause construction impacts on the environment beyond those otherwise described and evaluated throughout this Draft EIR.

The provision of recreational space on the Project Site would allow residents, employees, and visitors to have access to recreational facilities without leaving the Project Site. Provision of these on-site facilities would reduce or avoid potential impacts that might otherwise occur due to traffic, with related air quality emissions and noise impacts if the Project were to include off-site recreational space. The provision of on-site recreational facilities would reduce the Project's off-site impacts during Project operations. The Project does not include new off-site park facilities. Impacts regarding construction of new parks or the expansion of existing parks would be less than significant.

In sum, in determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in Sections 12.21, 17.12, and 21.10.3(a)(1) of the LAMC regarding the provision of useable open space and parkland requirements. Although the Project would not meet the parkland provision goals set forth in the Public Recreation Plan, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, the Project would ensure that the intent of the Public Recreation Plan's parkland standards would be met through its compliance with State law as enforced through the above-referenced LAMC requirements related to the provision and/or funding of parks and recreational spaces.

Thus, Project operation would not require the need for new or physically altered park or recreational facilities, the construction of which would cause significant adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, impacts to parks and recreational facilities would be less than significant.

### e) Cumulative Impacts

As presented in Chapter III, *General Description of Environmental Setting*, of this Draft EIR, the City has identified 137 related projects in the vicinity of the Project Site.

As discussed above, evaluations of park space are based on the service to residents as opposed to employees or visitors to an area. Most park visits originate from people's homes and residents would prefer using the convenience of local parks. Typically, employees are engaged in their work during the day and do not contribute to substantial demand for parks. If they use the parks, such usage would generally occur during the week rather the weekend. Given the LADRP methodology for evaluating park services, this cumulative analysis on parks and recreational facilities focuses on those projects among the 137 related projects that propose residential uses. All of the related projects with a residential component are located within the Hollywood Community Plan area except for Related Project No. 81, which is located in the City of West Hollywood. These related projects would cumulatively generate, in conjunction with the Project, demand on parks and recreational facilities. Similar to the Project, the residential population of the applicable related projects is 2.43 persons per household for related projects in the Hollywood Community<sup>33</sup> and 1.5 persons per household for Related Project No. 81, in West Hollywood.<sup>34</sup> As reported in **Table IV.K.4-4, *Cumulative Impacts to Parks and Recreational Facilities***, this calculation results in a net cumulative population growth of 40,539 residents. This calculation is, like the calculation for the Project conservative, as it assumes that all residents are new to the area, and would not simply be moving from one local location to another.

<sup>33</sup> The average household size is 2.43 persons per household based on the 2016 American Community Survey 5-year average estimate (2012-2016).

<sup>34</sup> According to the West Hollywood, Demographics website. Available at: <https://www.weho.org/business/interactive-data-tools/demographics>, accessed September 2019, the West Hollywood area has a total population of 36,611 and 24,170 household units. Based on these estimates, the average household size is 1.5 for West Hollywood.

**TABLE IV.K.4-4  
CUMULATIVE IMPACTS TO PARKS AND RECREATIONAL FACILITIES**

<b>Housing and Population</b>	<b>Housing Units</b>	<b>Average Household Size<sup>a, b</sup></b>	<b>Population</b>
Related Projects	16,517	2.43	40,136
Proposed Project <sup>c</sup>	166	2.43	403
<b>Total Cumulative</b>	<b>16,683</b>		<b>40,539</b>

## NOTES:

<sup>a</sup> The average household size is 2.43 persons per household based on the 2016 American Community Survey 5-year average estimate (2012-2016), as cited in Section IV.J, Population, Housing, and Employment, of this Draft EIR. It should be noted that related project population estimates do not take into account the potential replacement of existing housing and residents, and therefore may overestimate net new population increases.

<sup>b</sup> All related projects with a residential component are located within the Hollywood Community Plan area except for Related Project No.81, which is located in West Hollywood. According to the West Hollywood, Demographics website, <https://www.weho.org/business/interactive-data-tools/demographics>, accessed September 2019, the West Hollywood area has a total population of 36,611 and 24,170 household units. Based on these estimates, the average household size is 1.5 for West Hollywood. As such, 1.5 average household size was used for Related Project No. 81.

<sup>c</sup> The figures for the Project are net housing units and population figures, whereas the figures for the related projects are not net figures.

SOURCE: ESA, 2019.

This additional population would add to the existing demand for park and recreation services. However, not all related projects will be built, or will be as large as planned and some related projects may demolish existing residential units so the population figure is likely overstated. Moreover, the related projects include a large number of large-scale projects that typically include adequate recreational amenities to meet market demand and to comply with LAMC park and open space requirements. Therefore, as is the case with the Project, their impacts on local parks would be residual effects after primarily reliance on on-site activities, and those impacts would be dispersed over the large number of parks throughout the area.

As discussed above, the Project's provision of on-site open space would help to meet the recreational needs of its residents. While the Project would not meet the Citywide goals set forth in the PRP or Community-Wide Needs Assessment, which are not applicable in to individual development projects, with its proposed on-site open space and recreational facilities, the Project would be consistent with the City's applicable open space and parkland requirements. The inclusion of open space and recreational features would offset the Project's relatively small contribution to cumulative impacts as compared to the overall residential population generated by the related projects.

Further, Related Project No. 79 listed in Table III-1 in Chapter III, of this Draft EIR, is the proposed Hollywood Central Park, a 38-acre street-level community park built upon a cap over the Hollywood Freeway, providing green space and a range of park facilities. If developed, this related project would substantially reduce existing as well as future

impacts on park and recreational facilities per the Citywide goals discussed above, as well as enhance the quality of park and open space facilities for local residents. Further, all related projects with residential uses would be required to comply with the LAMC Section 12.21.G and recently amended LAMC Section 12.33, which require the provision of on-site open space and park facilities and/or payment in-lieu fees to offset a project's impact to off-site park and recreational facilities. Should any residential developments not be required to provide park and recreation facilities pursuant to Sections 12.21.G and 12.33, they would be required to pay a \$200 per unit 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. With compliance to applicable regulations, cumulative impacts to parks and recreational facilities would be less than significant.

Based on the above considerations, the Project would not make a cumulatively considerable contribution to cumulative parks and recreational facilities impacts and, as such, cumulative impacts on parks and recreational facilities would be less than significant.

#### **f) Mitigation Measures**

Project impacts regarding parks and recreation would be less than significant. Therefore, no mitigation measures are required.

#### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to parks and recreation would be less than without mitigation.

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## **IV. Environmental Impact Analysis**

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### **K.5. Public Services – Libraries**

#### **1. Introduction**

This section of the Draft EIR describes existing library facilities and services in the Project Site area, and provides an analysis of the potential impacts on these facilities and services that could occur as a result of the Project. In doing so, the analysis addresses available library capacity and whether it is sufficient to accommodate the estimated net population growth generated by the Project. The analysis is based in part on library standards and capacity data provided by City of Los Angeles Public Library (LAPL), which is included in Appendix K, of this Draft EIR.<sup>1</sup>

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) City of Los Angeles General Plan Framework**

The City of Los Angeles General Plan Framework, 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 facilities and services to meet the needs of the City's residents is 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 of plans and policies set forth in the General Plan Framework has been 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.

###### **(2) Hollywood Community Plan**

The 1988 Hollywood Community Plan includes three policies that pertain to library services. These policies contain directives to the LAPL.

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<sup>1</sup> Project specific information was provided by Tom Jung, Management Analyst II, Business Office, LAPL, via email correspondence on October 13, 2015; refer to Appendix K to this Draft EIR. However, updated library information has been provided by more recent LAPL correspondence provided for the Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter and the Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters. Both library response letters are also included within Appendix K to this Draft EIR.

**Policy 1** “[T]hat 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.<sup>2</sup>

### (3) Los Angeles Public Library Branch Facilities Plan

The LAPL Branch Facilities Plan (Facilities Plan) guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. The Facilities Plan was first adopted in 1988 and later revised and approved by the Board of Library Commissioners on February 8, 2007.<sup>3</sup> Under the revised 2007 Branch Facilities Plan, the service population for a branch library is determined by the size of the facility; refer to **Table IV.K.5-1, LAPL Branch Facilities Plan – Library Building Size Standards**. The Facilities Plan has been implemented with two bond measures: the 1989 Bond Program and the 1998 Bond Program.<sup>4</sup>

**TABLE IV.K.5-1  
LAPL BRANCH FACILITIES PLAN – LIBRARY BUILDING SIZE STANDARDS**

Library Type	Population Served	Size of Facility (sf)
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library recommended	90,000	12,500–14,500

SOURCE: Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR); Tom Jung, Management Analyst II, Business Office, LAPL, email correspondence dated October 13, 2015 (Appendix K to this Draft EIR); Los Angeles Public Library, *Building on Success: Strategic Plan, 2007–2010*, Appendix VI, Branch Facilities Plan, Draft Revision, page VI-4, prepared by Los Angeles Public Library, [http://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf), accessed August 2019.

<sup>2</sup> City of Los Angeles, *Hollywood Community Plan*, 1988. Available at: <https://planning.lacity.org/plans-policies/community-plan-area/hollywood>. Accessed August 2019.

<sup>3</sup> Los Angeles Public Library, *Building on Success: Strategic Plan 2007–2010*, Appendix VI, Branch Facilities Plan, Draft Revision, page VI-4, prepared by Los Angeles Public Library, [http://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf), accessed August 2019.

<sup>4</sup> Los Angeles Public Library, *Building on Success: Strategic Plan 2007–2010, Summary of Branch Facilities Plan Revision*, page VI-1, prepared by Los Angeles Public Library, [http://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf), accessed August 2019.

In 1989, City voters approved Phase 1 of the Facilities Plan through the 1989 Bond Program, which provided \$53.4 million for 26 library projects. Under Phase 1, 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 successfully 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.<sup>5</sup>

On November 3, 1998, Los Angeles voters approved Proposition DD, also known as the 1998 Library Facilities Bond. The 1988 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. Subsequently, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 projects involved replacing existing library facilities with 18 new library facilities on the existing City-owned sites, nine projects involved constructing libraries on newly acquired sites, five projects involving constructing new libraries on acquired sites in communities that previously did not have library services, and four projects involved renovating and expanding existing libraries. The entire 1988 Facilities Plan was completed by 2005.<sup>6</sup>

The revised 2007 Branch Facilities Plan is the current strategic plan for future LAPL developments to provide for the future library services and facilities needed for the population growth projections to the year 2030.<sup>7</sup> The LAPL Strategic Plan 2015–2020 is a five-year plan to detail expanded programs and services, referred to as Key Activities within the Plan, offered by LAPL.<sup>8</sup>

#### (4) Measure L

On March 8, 2011, Los Angeles voters approved Measure L, the Los Angeles Public Library funding initiative. Measure L amends the City Charter by gradually raising the level of guaranteed funding of the library system to 0.0300 percent of assessed property value over a period of four years (up from the current rate of 0.0175 percent). The LAPL estimates that this increase in funding will allow the LAPL to fully reimburse the general

<sup>5</sup> Los Angeles Public Library, *Building on Success: Strategic Plan 2007–2010, Summary of Branch Facilities Plan Revision*, page VI-1, prepared by Los Angeles Public Library, [http://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf), accessed August 2019.

<sup>6</sup> Los Angeles Public Library, *Building on Success: Strategic Plan 2007–2010, Summary of Branch Facilities Plan Revision*, page VI-1, prepared by Los Angeles Public Library, [http://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf), accessed August 2019.

<sup>7</sup> Los Angeles Public Library, *Building on Success: Strategic Plan, 2007–2010*, page VI-2, prepared by Los Angeles Public Library, [http://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf), accessed August 2019.

<sup>8</sup> Los Angeles County Public Library, *Strategic Plan 2015–2020*, page 6, prepared by Los Angeles Public Library, [https://www.lapl.org/sites/default/files/media/pdf/about/LAPL\\_Strategic\\_Plan\\_2015-2020.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf), accessed August 2019.

fund for all overhead expenses, restore library service on Mondays at all 73 libraries and on Sundays at nine libraries, and purchase new books.<sup>9</sup>

## b) Existing Conditions

The LAPL system provides library facilities and services to the Project Site and the City of Los Angeles. The LAPL consists of the Central Library and 72 community branches, with a multimedia inventory of over 7.1 million items and 2,600 computer workstations with access to the internet and electronic databases.<sup>10</sup>

The LAPL is a member of the Southern California Library Cooperative (SCLC).<sup>11</sup> 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 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.<sup>12</sup>

The LAPL service populations are estimated from LA Times Mapping L.A. database and branch library community boundaries.<sup>13</sup> The Hollywood Community Plan area is served by five branch libraries, which include the Frances Howard Goldwyn-Hollywood Regional Branch Library, the Wilshire Branch Library, the Will and Ariel Durant Branch Library, the John C. Fremont Branch Library, and the Fairfax Branch Library. Of these five facilities, the LAPL has identified four LAPL branch libraries that would serve the Project: the Frances Howard Goldwyn-Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, the John C. Fremont Branch Library, and the Fairfax Branch Library.<sup>14</sup>

**Figure IV.K.5-1, *Libraries Located in the Vicinity of the Project Site*, and Table IV.K.5-2, *Libraries Facilities 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, population served, and hours of operation.

<sup>9</sup> Los Angeles Public Library, Information About Measure L (Public Library Funding Charter Amendment). [http://www.lapl.org/sites/default/files/media/pdf/about/fact\\_sheet.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/fact_sheet.pdf), accessed August 2019.

<sup>10</sup> Los Angeles Public Libraries, Library Facts, Los Angeles Public Library, By the Numbers (FY) 2017-2018 [https://www.lapl.org/sites/default/files/media/pdf/about/LAPL\\_FY2017-18\\_Backgrounder\\_10022018.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_FY2017-18_Backgrounder_10022018.pdf), accessed August 2019.

<sup>11</sup> Southern California Library Cooperative, Member Libraries. <https://socallibraries.org/about/libraries>, accessed August 2019.

<sup>12</sup> Southern California Library Cooperative, About. Available at: <https://socallibraries.org/>, accessed August 2019.

<sup>13</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).

<sup>14</sup> Tom Jung, Management Analyst II, Business Office, LAPL, email correspondence dated October 13, 2015 (Appendix K to this Draft EIR).



**TABLE IV.K.5-2**  
**LIBRARY FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE**

<b>Library</b>	<b>Distance/ Direction from Project Site<sup>a</sup></b>	<b>Size (sq. ft.)</b>	<b>Service Population</b>	<b>Hours of Operation</b>
<b>Frances Howard Goldwyn-Hollywood Regional Branch Library</b> 1623 North Ivar Avenue Hollywood, CA 90028	0.27 miles southwest	19,000	100,006	10:00 a.m.–8:00 p.m. Mon.–Thur. 9:30 a.m.–5:30 p.m. Fri. & Sat 1:00 p.m.–5:00 p.m. Sun.
<b>Will and Ariel Durant Branch Library</b> 7140 West Sunset Boulevard Los Angeles, CA 90046	1.25 miles southwest	12,500	92,851	10:00 a.m.–8:00 p.m. Mon. & Wed. 12:00 p.m.–8:00 p.m. Tue. & Thur. 9:30 a.m.–5:30 p.m. Fri. & Sat. Closed Sun.
<b>John C. Fremont Branch Library</b> 6121 Melrose Avenue Los Angeles, CA 90038	1.46 miles southwest	7,361	18,418	10:00 a.m.–8:00 p.m. Mon. & Wed. 12:00 p.m.–8:00 p.m. Tue. & Thur. 9:30 a.m.–5:30 p.m. Fri. & Sat. Closed Sun.
<b>Fairfax Branch Library</b> 161 South Gardner Street Los Angeles, CA 90036	2.72 miles southwest	12,500	36,336	10:00 a.m.–8:00 p.m. Mon. & Wed. 12:00 p.m.–8:00 p.m. Tue. & Thur. 9:30 a.m.–5:30 p.m. Fri. & Sat. Closed Sun.

## NOTE:

<sup>a</sup> Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

SOURCE: Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR); Tom Jung, Management Analyst II, Business Office, LAPL, email correspondence dated October 13, 2015 (Appendix K to this Draft EIR); Service populations are estimated from LA Times Mapping L.A. database and branch library community boundaries. ESA, 2019.

The Frances Howard Goldwyn-Hollywood Regional Branch Library at 1623 North Ivar Avenue is located approximately 0.27 miles southwest of the Project Site. The library includes a total of 86,920 volumes and has an annual circulation of 119,553. 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. The library currently has 14.5 full-time staff positions. According to the LAPL, this 19,000-square-foot branch serves a population of 100,006 persons. Therefore, the Frances Howard Goldwyn-Hollywood Regional Branch does not currently meet the recommendations set forth in the 2007 Branch Facilities Plan (i.e., the addition of another branch when the community population reaches 90,000 persons). However, at this time,

there are no planned improvements or expansions to add capacity to the library or plans for the development of a new library to serve the community.<sup>15</sup>

The Will and Ariel Durant Branch Library at 7140 West Sunset Boulevard is located approximately 1.25 miles southwest of the Project Site. The library includes a total of 47,727 volumes and has an annual circulation of 114,149. 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. The library currently has 10.5 full-time staff positions. According to the LAPL, this 12,500-square-foot branch serves a population of 92,851 persons. Therefore, the Will and Ariel Durant Branch Library does not meet the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population over 45,000 persons) nor does the library meet the 2007 Branch Facilities Plan recommendation to add another branch when the community population reaches 90,000 persons. At this time, there are no planned improvements or expansions to add capacity to this library.<sup>16</sup>

The John C. Fremont Branch Library at 6121 Melrose Avenue is located approximately 1.46 miles southwest of the Project Site. The library includes a total of 40,452 volumes and has an annual circulation of 97,354. 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. The library currently has 8.5 full-time staff positions. According to the LAPL, this 7,361-square-foot branch library serves a population of 18,418 persons. Thus, the John C. Fremont Branch Library does not currently meet the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 12,500 square feet for a service population of less than 45,000 persons). However, at this time, there are no planned improvements or expansions to add capacity to the library or plans for the development of a new library to serve the community.<sup>17</sup>

The Fairfax Branch Library at 161 South Gardner Street is located approximately 2.72 miles southwest of the Project Site. The library includes a total of 52,262 volumes and has an annual circulation of 209,707. 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. The library currently has 11 full-time staff positions. According to the LAPL, this 12,500-square-foot branch serves a population of 36,336 people. Thus, the Fairfax Branch Library currently meets the building

<sup>15</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).

<sup>16</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR)

<sup>17</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).

size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 12,500 square feet for a service population of less than 45,000 persons).<sup>18</sup>

### 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 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?***

In assessing the Project's potential impacts related to libraries in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G questions:

- The net population increase resulting from the project;
- The demand for library services 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).

#### 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 libraries that serve the Project Site, determining the population capacity within the associated library service areas, and comparing the number of new Project-related residents to the capacity of the libraries to serve new residents. Capacity to serve new residents is based on a comparison of the number of people residing within the library service areas to the population standard for the size of the libraries. The number of Project residents was calculated by using the average household size of 2.43 persons per household based on the 2016 American

<sup>18</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).



Community Survey 5-year average estimate (2012–2016), as cited in Section IV.J, Population and Housing, of this Draft EIR.

### **c) Project Design Features**

There are no Project Design Features, such as an on-site library that would serve Project residents, that specifically relate to the Project's potential impacts on libraries.

### **d) Analysis of 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 or other performance objectives for libraries?***

#### **(1) Construction**

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 of their households. 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, Project-related construction workers would not generate a notable increase in resident population or a corresponding demand for library services in the vicinity of the Project Site.

**As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, 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, and no mitigation measures are required.**

#### **(2) Operations**

The Project would provide 210 residential units whose occupants would potentially use local libraries in the Project Site area. However, the Project Site is currently improved with 44 residential units, all of which would be demolished and removed to permit development of the Project. Therefore, the Project would result in a net increase of 166 residential units. Based on the average of 2.43 persons per household, the Project's net 166 residential units would generate approximately 403 new residents.

As stated above, the LAPL has identified four LAPL branch libraries that would serve the Project: the Frances Howard Goldwyn-Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, the John C. Fremont Branch Library, and the Fairfax Branch Library.

As reported in Table IV.K.5-2 the Frances Howard Goldwyn-Hollywood Regional Branch Library is the library nearest the Project Site. Its current service population is 100,006 persons. Thus, with the addition of the Project's 403 net new residents, the service population of this Library would increase to 100,409 persons. As previously noted, under Existing Conditions, the Frances Howard Goldwyn-Hollywood Regional Library does not currently meet the 2007 Branch Facilities Plan's recommendation to add another branch when the community population reaches 90,000 persons. As such, the community would continue to be underserved by the facility with the addition of the Project's 403 net new residents. There are currently no plans to expand this library or develop additional facilities to serve the area, and this library will continue to operate without meeting the recommendation in the 2007 Branch Facilities Plan.<sup>19</sup>

The Will and Ariel Durant Branch Library is located approximately 1.25 miles from the Project Site. As reported in Table IV.K.5-2, the Will and Ariel Durant Branch Library's current service population is 92,851 persons. Thus, with the addition of the Project's 403 net new residents, the service population of this Library would increase to 93,254 persons. As noted above, under Existing Conditions, the Will and Ariel Durant Branch Library does not currently meet the building size recommendations nor the recommendation to add another branch when the community population reaches 90,000 persons set forth in the 2007 Branch Facilities Plan. Therefore, the facility would continue to be undersized with the addition of the Project's 403 net new residents. There are currently no plans to expand this library or develop additional facilities to serve the area, and this library will continue to operate without meeting the recommended building size standards.<sup>20</sup>

The John C. Fremont Branch Library is located approximately 1.46 miles from the Project Site. As reported in Table IV.K.5-2, the John C. Fremont Branch Library's current service population is 18,418 persons. Thus, with the addition of the Project's 403 net new residents, the service population of this Library would increase to 18,821 persons. As noted above, under Existing Conditions, the John C. Fremont Library does not currently meet the building size recommendations set forth in the 2007 Branch Facilities Plan. Therefore, the facility would continue to be undersized with the addition of the Project's 403 net new residents. There are currently no plans to expand this library or develop

<sup>19</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).

<sup>20</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).

additional facilities to serve the area, and this library will continue to operate without meeting the recommended building size standards.<sup>21</sup>

The Fairfax Branch Library is located approximately 2.72 miles from the Project Site. As reported in Table IV.K.5-2, the Fairfax Branch Library's current service population is 36,336 persons. Thus, with the addition of the Project's 403 net new residents, the service population of this Library would increase to 36,739 persons. The Fairfax Branch Library, at 12,500 square feet, is currently sized adequately for a population below 45,000 persons. Therefore, the Fairfax Branch Library does meet the recommended standards of the 2007 Branch Facilities Plan without the Project and would also meet those standards with the Project.

The L.A. CEQA Thresholds Guide considers whether a project includes features that would reduce demand for library services. All of the Project's residential units would be equipped for the use of individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.<sup>22,23</sup> In addition, the Project would generate revenue for the City's General Fund that could be used for the provision of library facilities, staffing, and materials, as deemed appropriate. The Project's contribution to the General Fund would help offset the Project-related increase in demand for library services. Further, Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents.

Based on the above, and pursuant to the existing service populations and library sizing standards recommended in the 2007 Branch Facilities Plan, operation of the Project would not create any new exceedance of the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Under both existing and future conditions, without or with the Project, the Fairfax Branch Library would meet the recommendations contained in the 2007 Branch Facilities Plan. However, the Frances Howard Goldwyn-Hollywood Regional Branch, the Will and Ariel Durant Branch Library, and the John C. Fremont Branch Library would continue operations without meeting the recommendations contained in the 2007 Branch Facilities Plan. However, the increase in demand for library services would be expected to be dispersed between the primary regional branch library and the other three local branch libraries identified by the LAPL. As the Frances Howard Goldwyn-Hollywood Regional Branch, the Will and Ariel Durant Branch Library, and the John C. Fremont

<sup>21</sup> Modera Argyle Draft EIR, April 2019, Appendix I, LAPL Response Letter (Appendix K to this Draft EIR); Hollywood & Gower Draft EIR, September 2018, Appendix H, Service Agency Letters (Appendix K to this Draft EIR).

<sup>22</sup> Denise A. Troll, Distinguished Fellow, Digital Library Foundation, *How and Why Are Libraries Changing?* January 9, 2001, [https://www.researchgate.net/publication/249901516\\_How\\_and\\_Why\\_Libraries\\_are\\_Changing\\_What\\_We\\_Know\\_and\\_What\\_We\\_Need\\_to\\_Know](https://www.researchgate.net/publication/249901516_How_and_Why_Libraries_are_Changing_What_We_Know_and_What_We_Need_to_Know), accessed August 2019.

<sup>23</sup> Carol Tenopir, *Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies*, August 2003, <https://www.clir.org/wp-content/uploads/sites/6/pub120.pdf>, accessed August 2019.

Branch Library are already undersized in existing conditions, the Project would not be anticipated to result in a substantial increase in demand. **Therefore, Project 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, and no mitigation is required.**

### e) Cumulative Impacts

Chapter III, *General Description of Environmental Setting*, of this Draft EIR, lists the 137 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 only those related projects located within Los Angeles that include residential housing and that would be located within the boundaries of the library districts identified by the LAPL as serving the Project. Those related residential projects are listed in **Table IV.K.5-3, Cumulative Population in Library Service Areas**.

The location of these related projects in relation to the library service areas is shown in **Figure IV.K.5-2, Library Districts and Residential Related Projects**. Using the 2.43 persons per household figure, and without reducing the number of residential units by the number of existing units that would be demolished in order to build the related project, it is estimated that the related projects would generate a total of 36,665 residents, of which 30,714 would be located within the Frances Howard Goldwyn-Hollywood Regional Branch Library service boundaries, 639 would be located within the Will and Ariel Durant Branch Library service boundaries, 4,877 would be located within the John C. Fremont Branch Library service boundaries, and 435 would be in the Fairfax Branch Library service boundaries. With the addition of the Project's estimated net population of 403 residents, the estimated cumulative total of new residents would be 37,068 residents.

The Frances Howard Goldwyn-Hollywood Regional Branch Library currently has a service population of 100,006 persons. With the addition of the estimated residents from the related residential projects in its service boundaries, in conjunction with the Project, its total estimated service area population would increase by 31,117 residents to a new estimated service area population of 131,123 residents. Pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan, the new estimated service area population of 131,123 residents for the Frances Howard Goldwyn-Hollywood Regional Branch Library would warrant the addition of a new branch library since the estimated service population would exceed 90,000 persons. As such, the community would continue to be underserved by the facility with the addition of the new estimated service area population of 131,123 residents.

**TABLE IV.K.5-3  
CUMULATIVE POPULATION IN LIBRARY SERVICE AREAS**

<b>Map No.<sup>a</sup></b>	<b>Project</b>	<b>Location</b>	<b>Residential Population<sup>b, c</sup></b>
<b>Frances Howard Goldwyn-Hollywood Regional Branch Library</b>			
1	Paseo Plaza Mixed-Use	5651 W. Santa Monica Boulevard	1,062
2	El Centro (formerly Boulevard 6200 Mixed-Use)	6200 W. Hollywood Boulevard	2,313
3	Mixed-Use	5939 W. Sunset Boulevard	727
5	Argyle House (formerly Yucca Street Condos)	6230 W. Yucca Street	207
8	SunWest Project (Mixed-Use)	5525 W. Sunset Boulevard	712
9	Mixed-Use	5245 W. Santa Monica Boulevard	165
11	Hollywood Production Center	1149 N. Gower Street	139
12	Hollywood Gower Mixed-Use	6100 W. Hollywood Boulevard	535
22	Selma Community Housing	1603 N. Cherokee Avenue	160
27	Mixed-Use	1610 N. Highland Avenue	603
29	Millennium Hollywood Mixed-Use Project (current Project on this site is the Hollywood Center Project) <sup>24</sup>	1740 N. Vine Street	1,196
31	6200 W. Sunset Boulevard	6200 W. Sunset Boulevard	656
32	Apartments	1411 N. Highland Avenue	219
33	Apartment Project	1824 N. Highland Avenue	287
36	Columbia Square Mixed-Use	6121 W. Sunset Boulevard	486
37	Mixed-Use (High Line West)	5550 W. Hollywood Boulevard	676
42	Sunset & Gordon Mixed Use	5935 W. Sunset Boulevard	756
44	Mixed-Use	1350 N. Western Avenue	496
45	Palladium Residences	6201 W. Sunset Boulevard	1,776
46	5600 W. Hollywood Boulevard	5600 W. Hollywood Boulevard	80
49	6250 Sunset (Nickelodeon)	6250 W. Sunset Boulevard	486
53	1717 Bronson Avenue	1717 N. Bronson Avenue	216
56	Las Palmas Residential (Hollywood Cherokee)	1718 N. Las Palmas Avenue	474
61	Academy Square	1341 Vine Street	608
64	Mixed-Use	1310 N. Cole Avenue	911
67	Apartments	2864 N. Cahuenga Boulevard	729
71	Sunset & Vine Mixed-Use	1538 N. Vine Street	744

<sup>24</sup> See Chapter III of this Draft EIR for additional details on the Hollywood Center Project.

Map No. <sup>a</sup>	Project	Location	Residential Population <sup>b, c</sup>
72	Apartments & Retail	6758 W. Yucca Street	656
76	Residential Development	6001 W. Carlton Way	102
78	Apartment	7046 W. Hollywood Boulevard	102
86	Hollywood Crossroads	1540–1552 Highland Avenue & Others	2,309
88	Mixed-Use	3400 N. Cahuenga Boulevard	129
89	Condominium	3450 N. Cahuenga Boulevard	165
91	Mixed-Use	7107 Hollywood Boulevard	996
92	5750 Hollywood	5750 Hollywood Boulevard	391
98	Highland Center Mixed-Use Project	1600 N. Highland Avenue	603
101	Apartments	5460 W Fountain Avenue	182
102	Hollywood De Longpre Apartments	5632 De Longpre Avenue	450
104	Mixed-Use	1657 N. Western Avenue	260
108	Apartments	1749 Las Palmas Avenue	170
109	Mixed-Use	1868 N. Western Avenue	253
110	6400 Sunset Mixed-Use	6400 Sunset Boulevard	564
111	Mixed-Use	1311 Cahuenga Boulevard	897
113	747 N Western Avenue	747 N. Western Avenue	107
114	6630 W Sunset Boulevard	6630 W. Sunset Boulevard	97
116	Sunset & Western	5420 W. Sunset Boulevard	1,786
117	Hollywood & Wilcox	6430–6440 W. Hollywood Boulevard	632
121	Onni Group Mixed-Use Development	1360 N. Vine Street	1,042
123	Melrose & Beachwood	5570 W. Melrose Avenue	126
124	Modera Argyle	1546 N. Argyle Avenue	671
125	Montecito Senior Housing	6650 W. Franklin Avenue	165
128	6140 Hollywood	6140 Hollywood Boulevard	66
130	Apartments	1601 N. Las Palmas Avenue	209
131	1723 N Wilcox Residential	1723 N. Wilcox Avenue	165
<b>Subtotal</b>			<b>30,714</b>
<b>Subtotal with Project (403 Residents)</b>			<b>31,117</b>
<b>Will and Ariel Durant Branch Library</b>			
41	Mixed-Use	7120 W. Sunset Boulevard	107
55	Sunset Mixed-Use	7500–7510 W. Sunset Boulevard	532
<b>Subtotal</b>			<b>639</b>
<b>Subtotal with Project (403 Residents)</b>			<b>1,042</b>

Map No. <sup>a</sup>	Project	Location	Residential Population <sup>b, c</sup>
<b>John C. Fremont Branch Library</b>			
7	Archstone Hollywood Mixed-Use Project	6911 W. Santa Monica Boulevard	561
25	Residential	712 N. Wilcox Avenue	243
35	The Lexington Mixed-Use	6677 W. Santa Monica Boulevard	1,689
48	904 La Brea Avenue	904 La Brea Avenue	411
51	2014 Residential	707 N. Cole Avenue	204
57	Mixed-Use	901 N. Vine Street	207
63	Mixed-Use	1233 N. Highland Avenue	175
65	Mixed-Use at 6901 Santa Monica Boulevard	6901 Santa Monica Boulevard	561
70	Mixed-Use	6915 Melrose Avenue	32
74	Condos & Retail	5663 Melrose Avenue	233
103	Melrose Crossing Mixed-Use	7000 Melrose Avenue	97
105	McCadden Campus (LGBT)	1118 N. McCadden Place	464
<b>Subtotal</b>			<b>4,877</b>
<b>Subtotal with Project (403 Residents)</b>			<b>5,280</b>
<b>Fairfax Branch Library</b>			
24	La Brea Gateway	915 N. La Brea Avenue	435
<b>Subtotal</b>			<b>435</b>
<b>Subtotal with Project (403 Residents)</b>			<b>838</b>
<b>Related Projects Total</b>			<b>36,665</b>
<b>Grand Total Cumulative (Related Projects with Project)</b>			<b>37,068</b>

## NOTE:

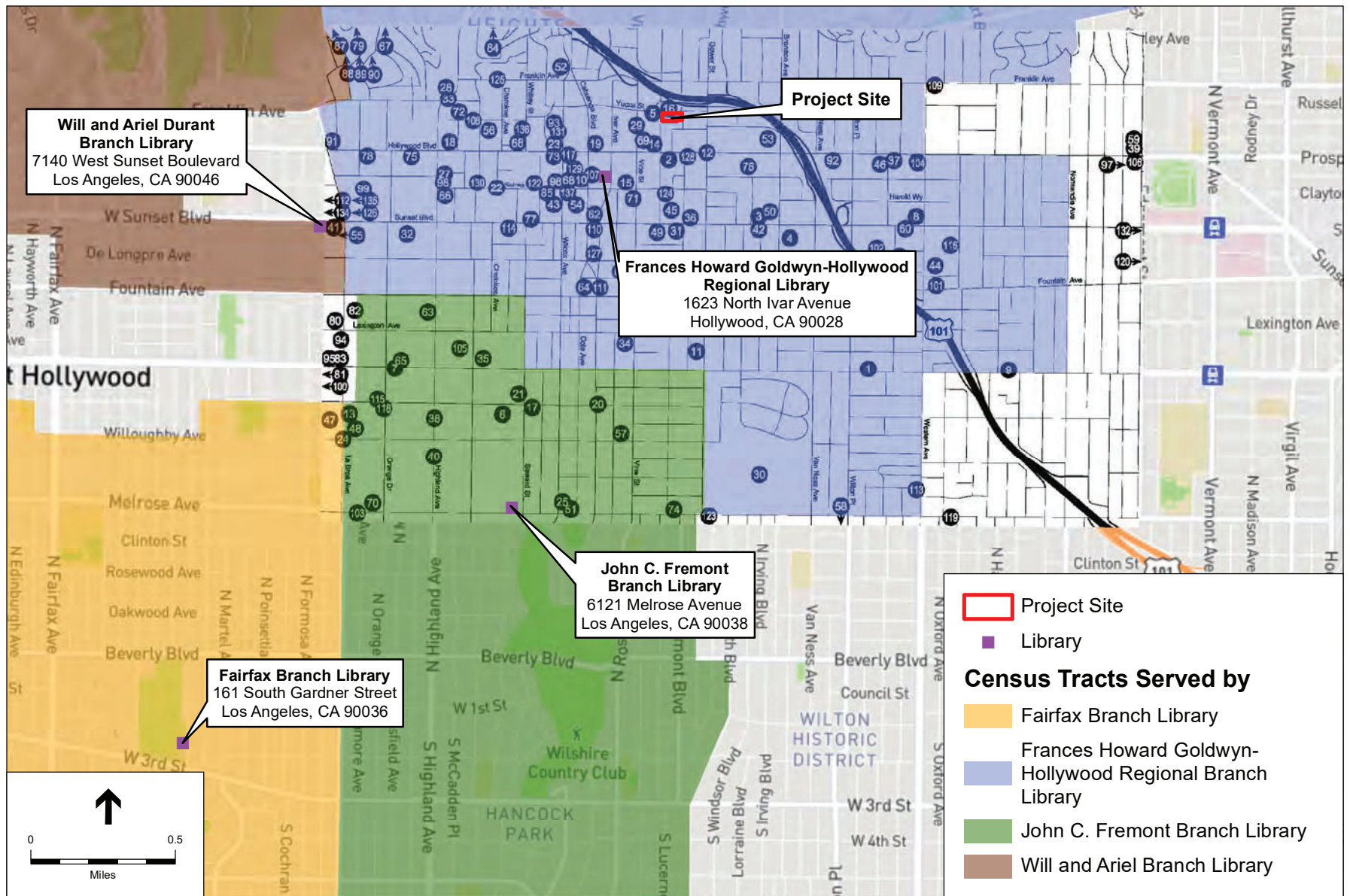
Related residential projects #58, #80, #81, #82, #83, #94, #95, #97, #99, #100, #106, #119, #120, #126, #132, and #135 are located outside of the service areas of the Frances Howard Goldwyn-Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, the John C. Fremont Branch Library, and the Fairfax Branch Library.

<sup>a</sup> Corresponds with Map Nos. on Figure III-1 of this Draft EIR.

<sup>b</sup> The average household size is 2.43 persons per household based on the 2016 American Community Survey 5-year average estimate (2012–2016) as cited in Section IV.J, *Population and Housing*, of this Draft EIR should be noted that related project population estimates do not take into account the potential replacement of existing housing and residents, and therefore may overestimate net new population increases.

<sup>c</sup> Totals are rounded up to the nearest whole number.

SOURCE: Gibson Transportation Consulting, Inc. (related projects), and ESA (population calculations), 2019.



SOURCE: Open Street Map 2017.

6220 West Yucca Project

**Figure IV.K.5-2**

Library Districts and Residential Related Projects



The estimated cumulative population count conservatively assumes that all of the Project's residents and all residents of the related projects within this service district would patronize the Frances Howard Goldwyn-Hollywood Regional Branch Library. Additionally, the related projects' estimated population figures are conservative and do not take into account the fact that a number of the related projects may not be approved or built, a number of the related projects that may be reduced in size, and that a number of related projects may involve demolition of existing housing units to accommodate new development. Further, of the many related projects that are located within the LAPL-defined service area of the Frances Howard Goldwyn-Hollywood Regional Branch Library, two of the related projects (related projects #32, #78, and #91, with a population of approximately 321 residents) are actually closer to the Will and Ariel Durant Branch Library. Moreover, it is reasonable to assume that actual visits to this library (as well as the other libraries) would also likely be lower than suggested due to new technologies that allow individuals to do on-line research and interact with their local library through electronic means. Also, at 19,000 square feet, the Frances Howard Goldwyn-Hollywood Regional Branch Library is substantially larger than the 14,500 square feet that can accommodate populations approaching the cumulative growth identified.

Overall, given the size of the current facility, the likely overstated population count of the related projects and decreased demand on physical libraries due to internet use, it is not expected that the need for new library facilities would be triggered, even in the unlikely scenario that all potential library users used this one library. Therefore, the Frances Howard Goldwyn-Hollywood Regional Branch Library is anticipated to have adequate capacity to serve cumulative residential growth. Further, per the LAPL letters in Appendix K, there are no planned improvements to add capacity through expansion or through development of any other libraries to serve this community, including the library, despite anticipated growth in the area.

The Will and Ariel Durant Branch Library currently has a service population of 92,851 persons. If all Project residents patronized this library, those residents, together with the estimated residents from the two related projects in its service boundaries, would total 1,042 residents, for a new estimated service area population of 93,893 residents. Therefore, the Will and Ariel Durant Branch Library would not meet the recommend standards of the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population over 45,000 persons) with or without the Project or cumulative development. Further, the library would warrant the addition of a new branch library since the estimated service population would exceed 90,000 persons. Therefore, the facility would continue to be undersized with the addition of the new estimated service area population of 93,893 residents. According to the LAPL letters in Appendix K, there are no planned improvements to add capacity through expansion nor through development of any other libraries to serve this community, including this library, despite the anticipated growth in the area.

The John C. Fremont Branch Library currently has a service population of 18,418 persons. If all Project residents patronized this library, those residents, together with the

estimated residents from the 10 related projects in its service boundaries, would total 5,280 residents for a new estimated service area population of 23,698 residents. The John C. Fremont Branch Library, at 7,361 square feet, is currently sized below the 12,500-square-foot standard recommended to serve a population of up to 45,000 persons. Therefore, the John C. Fremont Branch Library would not meet the recommended standards of the 2007 Branch Facilities Plan with or without the Project or cumulative development. However, the addition of the new estimated service area population would not reach the 90,000 trigger for consideration of a new branch library. According to the LAPL letters in Appendix K, there are no planned improvements to add capacity through expansion or through development of any other libraries to serve this community, including this library, despite the anticipated growth in the area.

The Fairfax Branch Library currently has a service population of 36,336 persons. If all Project residents patronized this library, those residents, together with estimated residents from the related projects #24 in its service boundaries, would total 838 residents for a new estimated service area population of 37,174 residents. The Fairfax Branch Library, at 12,500 square feet, is currently sized adequately to serve a population below 45,000 persons. Therefore, the Fairfax Branch Library would meet the recommended standards of the 2007 Branch Facilities Plan with or without the Project or cumulative development. Further, the LAPL does not consider possible development of a new library until a service area population reaches 90,000. As such, the new estimated service area population of 37,174 residents would be well below the 90,000 level. According to the LAPL letters in Appendix K, there are no planned improvements to add capacity through expansion or through development at any other libraries to serve this community, including this library, despite the anticipated growth in the area.

Moreover, similar to the Project, the related projects would generate revenue to the City's General Fund that could be used to fund LAPL expenditures as necessary to offset the cumulative incremental impact on library services. Also, as previously noted, Los Angeles voters, recognizing the need to provide adequate library services, approved Measure L, which gradually increases LAPL funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent, to keep libraries open longer and improve library services, thereby providing LAPL a mechanism to address the needs of additional population.

In view of the facts that the populations estimated for the related projects are overstated, that the internet access to library services and resources has reduced the demand on physical library facilities and services, and that, as stated in the LAPL letters in Appendix K, the LAPL has no planned improvements to add capacity through expansion or through development at any libraries to serve this community, the Project's contribution to cumulative impacts on libraries would not be cumulatively considerable and cumulative impacts on libraries would be less than significant.

The LAMC recommends a per capita fee of \$200 to be used for staff, books, computers, and other library materials. Fees will be paid by the Project Applicant, as a condition of the Project approval.

**f) Mitigation Measures**

Project impacts regarding library facilities and services would be less than significant. Therefore, no mitigation measures are required.

**g) Level of Significance After Mitigation**

Project-level and cumulative impacts to library services would be less than significant without mitigation.

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# IV. Environmental Impact Analysis

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## L. Transportation

### 1. Introduction

This section assesses potential Project impacts based on the Memo titled “*CEQA Thresholds Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California*” (referred to as the “CEQA Thresholds Transportation Memorandum”) prepared by Gibson Transportation Consulting, Inc. dated February 7, 2020 and provided in Appendix L-1 of this Draft EIR. The CEQA Thresholds Transportation Memorandum was prepared to address the applicable CEQA-related components within the Los Angeles Department of Transportation’s (LADOT’s) *Transportation Assessment Guidelines* (TAG) adopted in July 2019.

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 identifies “non-CEQA” transportation issues, which include: 1) pedestrian, bicycle, and transit facilities;<sup>1</sup> 2) project access, safety, and circulation; 3) construction traffic; and 4) residential street cut-through analysis. The analyses of these “non-CEQA” issues are not required by CEQA and therefore are not included in this EIR. However, prior to the adoption of the TAG, an analysis of intersection levels of service (LOS), Project access and circulation, construction traffic, and residential street cut-through traffic was prepared as part of a *Traffic Study* prepared by Gibson Transportation Consulting, dated February 2018, pursuant to a memorandum of understanding (MOU) with LADOT dated July 27, 2015. Accordingly, the LOS analysis and other non-CEQA transportation analyses included as part of the Traffic Study are provided for informational purposes only in Appendix L-2 of this Draft EIR. However, it is acknowledged that traffic data collected as part of the Traffic Study (i.e., roadway segment volumes) was used for purposes of calculating applicable mobile-source noise

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<sup>1</sup> As indicated in the TAG, the pedestrian, bicycle, and transit facilities assessment is intended to determine a project’s potential physical or demand-based deficiencies to these facilities. As these are non-CEQA analyses, these are not presented in this EIR. However, as indicated previously, 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) in Project Impact analysis below.

levels and air quality emissions in Sections IV.B, *Air Quality*, and Section IV.I, *Noise*, respectively.

Chapter 10 of the Traffic Study, which is provided in Appendix L-2 of this Draft EIR provides an analysis of impacts to Caltrans's facilities for informational purposes only in response to Caltrans's comment letter dated December 21, 2015, submitted in response to the Notice of Preparation for the Draft EIR (see Appendix A of this EIR for a copy of the comment letter).

## **2. Environmental Setting**

### **a) Regulatory Framework**

#### **(1) State of California**

##### **(a) *Complete Streets Act***

The Complete Streets Act (Assembly Bill 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 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, new 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.<sup>2</sup>

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 transit priority area shall not be considered significant impacts on the environment.”<sup>3</sup> 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.<sup>4</sup> 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.”<sup>5</sup> PRC 21064.3 defines “major transit stop” as “a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods.”<sup>6</sup> 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).<sup>7,8</sup>

## (2) Regional

### (a) Congestion Management Program (CMP)

The Congestion Management Program (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.

<sup>2</sup> 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. Available at: <https://ladot.lacity.org/sites/g/files/wph266/f/VMT%20Guidelines%20Announcement%20-%20August%202019.pdf>. Accessed February 2020.

<sup>3</sup> California Public Resources Code, Section 21099(d)(1).

<sup>4</sup> California Public Resources Code, Section 21099(a)(4).

<sup>5</sup> California Public Resources Code, Section 21099(a)(7).

<sup>6</sup> California Public Resources Code, Section 21064.3 as amended under AB 1560.

<sup>7</sup> City of Los Angeles Department of City Planning, ZIMAS, accessed June 4, 2019.

<sup>8</sup> City of Los Angeles Map showing Transit Priority Areas, [https://files.alston.com/files/docs/ZI%202451-Please see Section IV.F, Greenhouse Gas Emissions, of this EIR for a more detailed discussion. TPA-Aesthetics-and-Parking.pdf](https://files.alston.com/files/docs/ZI%202451-Please%20see%20Section%20IV.F,%20Greenhouse%20Gas%20Emissions,%20of%20this%20EIR%20for%20a%20more%20detailed%20discussion.%20TPA-Aesthetics-and-Parking.pdf), accessed July 28, 2019.

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 announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of 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.

(b) *Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*

In April 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents a long-term vision for the region's transportation system through the year 2040. It identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region, and balances the region's future mobility and housing needs with economic, environmental and public health goals. As stated in the 2016 RTP/SCS, SB 375 required SCAG and other Metropolitan Planning Organizations throughout the State to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.<sup>9</sup> Within the 2016 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTAs), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.<sup>10</sup> Local jurisdictions are encouraged to focus housing and employment growth within HQTAs.<sup>11</sup> The Project Site is located within an HQTA as designated by the 2016 RTP/SCS.<sup>12,13</sup> Please refer to Section IV.H, *Land Use and Planning*, for a detailed discussion of the provisions of the 2016 RTP/SCS that apply to the Project. As demonstrated therein, the Project would be consistent with applicable goals and principles set forth in the 2016 RTP/SCS.

<sup>9</sup> SCAG 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 166, adopted April 2016.

<sup>10</sup> Ibid., p. 189.

<sup>11</sup> Ibid., p. 76.

<sup>12</sup> Ibid., Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.

<sup>13</sup> Los Angeles County Metropolitan Transportation Authority (Metro). "High Quality Transit Areas—Southwest Quadrant," [http://media.metro.net/projects\\_studies/call\\_projects/images/Southwest%20Quad%20Map.pdf](http://media.metro.net/projects_studies/call_projects/images/Southwest%20Quad%20Map.pdf), accessed July 28, 2019.



### (3) City of Los Angeles

#### (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.<sup>14</sup> 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) *Mobility Plan 2035 and 2010 Bicycle Plan*

The City of Los Angeles General Plan Framework Element (Framework Element) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use. In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which superseded the Transportation Element, and which was subsequently amended in November 2015, January 20, 2016, and September 2016. The Mobility Plan 2035 is a comprehensive update of the City's Transportation Element that incorporates "complete streets" principles. Government Code Sections 65302(b)(2)(A) and (B) require a circulation element (i.e., Mobility Plan) to provide for a balanced, multimodal transportation network that meets the needs of all users of street, roads, and highways. "All users" by definition in the statute includes "bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors." This requirement was established as part of Assembly Bill 1358, which is referred to as the California Complete Streets Act, as well as Caltrans Deputy Directive DD-64-R1, Complete Streets: Integrating the Transportation System.<sup>15,16</sup>

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. The Plan serves to meet the goals in SCAG's Regional Transportation Plan to decrease the vehicle miles traveled (VMT) per capita by five percent every five years, reaching 20 percent by 2035, and to meet a nine percent per capita greenhouse gas reduction by 2020 and a 16 percent per capita reduction by 2035.

<sup>14</sup> City of Los Angeles, City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric under the California Environmental Quality Act. Available at: <https://ladot.lacity.org/sites/g/files/wph266/f/VMT%20Guidelines%20Announcement%20-%20August%202019.pdf>. Accessed February 2020.

<sup>15</sup> California Legislative Information, Assembly Bill No. 1358, Planning: Circulation Element: Transportation, approved September 30, 2008, [http://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=200720080AB1358](http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200720080AB1358). Accessed June 23, 2017.

<sup>16</sup> California Department of Transportation, Deputy Directive, Number DD-64-R1: Complete Streets – Integrating the Transportation System, <https://dot.ca.gov/-/media/dot-media/programs/local-assistance/documents/bike/f0011235-dd-64-r1-signed.pdf>. Accessed June 23, 2017.

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 represents 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.
  - Avenues pass through both residential and commercial areas and include three categories:
    - Avenue I provides up to two travel lanes in each direction with a target operating speed of 35 mph.
    - Avenue II provides up to two travel lanes in each direction with a target operating speed of 30 mph.
    - Avenue III provides 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, and/or
  - 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.<sup>17</sup> With a stated policy to reduce automobile trips and greenhouse gas emissions by converting five percent of all daily trips and three percent of commute trips into bicycle trips by 2020, the 2010 Bicycle Plan establishes a Backbone Bikeway Network and Neighborhood Bikeway Network linking Regional Centers to promote bicycle usage. Additional details are provided below.

*(c) Vision Zero Action Plan/ Vision Zero Corridor Plans*

Vision Zero Los Angeles is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. The policy was first adopted as part Mobility Plan 2035 and strengthened by mayoral directive in 2015. The City released the Vision Zero Action Plan in January 2017; it provides the City with a blueprint to reduce traffic fatalities by 20 percent by the end of 2017 with the ultimate goal of eliminating traffic deaths by 2025.<sup>18</sup> Annually developed Action Plans emphasize creating safe streets for all users, developing a culture of safety, adopting policy measures to promote safety, and using data to inform the most effective solutions.

In the Project Site vicinity the High Injury Network (HIN) includes Hollywood Boulevard, Yucca Street west of Argyle Avenue, , and Franklin Avenue east of Beachwood Drive.<sup>19</sup> None of the streets adjacent to the Project Site are part of the High Injury Network.

<sup>17</sup> Los Angeles Department of City Planning, 2010 Bicycle Plan, adopted March 1, 2011. Available at: [http://clkrep.lacity.org/onlinedocs/2010/10-2385-S2\\_MISC\\_07-11-11.pdf](http://clkrep.lacity.org/onlinedocs/2010/10-2385-S2_MISC_07-11-11.pdf). Accessed December 12, 2017.

<sup>18</sup> City of Los Angeles. Vision Zero Action Plan 2015-2025. Available at: <https://ladotlivablestreets-cms.org/uploads/d704aa3913e440d5ab4cb91930e902d4.pdf>. Accessed September 19, 2018.

<sup>19</sup> Los Angeles Department of Transportation Livable Streets. Overall Map & Data, Available at: <https://ladotlivablestreets.org/overall-map/maps>, accessed February 12, 2020.

(d) *Hollywood Community Plan*

The 1988 Hollywood Community Plan includes one transportation-related objective that is 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 1988 Hollywood 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 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.

(e) *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.<sup>20</sup> 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.

(f) *Citywide Design Guidelines*

*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.<sup>21</sup> The Design Guidelines are organized around three design approaches: pedestrian-first design, 360-degree design, and climate-adapted design.

(g) *Walkability Checklist*

The *Walkability Checklist – Guidance for Entitlement Review* (Walkability Checklist) serves as a guide for enhancing pedestrian movement, access, comfort, and safety to

<sup>20</sup> 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. Available at: [https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan\\_for\\_a\\_Healthy\\_Los\\_Angeles.pdf](https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf). Accessed August 2019.

<sup>21</sup> City of Los Angeles Department of City Planning Urban Design Studio. *Citywide Design Guidelines*, October 2019. Available at: [https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide\\_Design\\_Guidelines.pdf](https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide_Design_Guidelines.pdf). Accessed February 2020.

contribute to the overall walkability of the City.<sup>22</sup> Transportation-applicable topics include: sidewalks, crosswalks/street crossings, on-street parking, building orientation, and off-street parking and driveways.

(h) *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.<sup>23</sup> 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.

(i) *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 have been 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 transportation impacts.

Project applicants and consultants must follow the procedures and standards set forth in the TAG when preparing and submitting transportation assessments 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.

<sup>22</sup> City of Los Angeles Department of City Planning. *The Walkability Checklist – Guidance for Entitlement Review*, November 2008. Available at: <http://urbandesignla.com/resources/docs/LAWalkabilityChecklist/Io/LAWalkabilityChecklist.pdf>. Accessed February 2020.

<sup>23</sup> City of Los Angeles Department of City Planning. *Mobility Hubs: A Reader's Guide*, 2016. Available at: <http://www.urbandesignla.com/resources/docs/MobilityHubsReadersGuide/hi/MobilityHubsReadersGuide.pdf>. Accessed August 2019.

(j) *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.

(k) *LADOT Transportation Technology Strategy – Urban Mobility in a Digital Age*

The LADOT transportation technology strategy, based on *Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles* (Ashley Z. Hand, August 2016), is designed to ensure the City stays on top of emerging transportation technologies as both a regulator and a transportation service provider. This strategy document includes the following goals:

- Data as a Service: Providing and receiving real-time data to improve the City's ability to serve transportation needs
- Mobility as a Service: Improving the experience of mobility consumers by encouraging partnerships across different modes and fostering clear communication between transportation service providers
- Infrastructure as a Service: Re-thinking how the City pays for, maintains, and operates public, physical infrastructure to provide more transparency

LADOT also developed the *Technology Action Plan* (2019) to realize the vision developed in Transportation Technology Strategy. Key action steps include:

- Develop a comprehensive digital inventory of the City's signs, parking meters, curb paint, and regulatory tools
- Continue to develop and maintain the Automated Traffic Surveillance and Control system
- Use active management strategies to dynamically monitor and control things like speed limits, parking availability, detour routes, etc.
- Develop a mobility data specification around which software tools can be developed and data can be accessed
- Develop a transportation tax model that minimizes data collection and retention in favor of user privacy.

(l) *Los Angeles Municipal Code (LAMC)*

The Los Angeles Municipal Code (LAMC) Section 12.21.A.16 includes bicycle parking requirements for new development. There are distinct requirements for the number of required long-term spaces and short-term spaces. Long-term spaces provide for bicycle storage overnight or longer, while short-term spaces are intended to be more easily accessible as they are typically used for hours or less at a time. The Project's apartments would be required to provide one long-term bicycle parking space per unit and one short-

term bicycle parking space for each 10 units. Its hotel rooms would be required to provide one long-term and one short-term bicycle parking space per 20 rooms. Its restaurant and retail uses would be required to provide one short-term and one long-term bicycle parking space per 2,000 square feet.

LAMC Section 12.37 requires that a project dedicate and improve adjacent streets to half-right-of-way (ROW) standards consistent with street designations from the Mobility Plan or request a waiver of dedication or improvement supported by findings. The Project's entitlement request includes a request for waiver of dedication on Yucca Street and Vista Del Mar Avenue.

## **b) Existing Conditions**

### **(1) Existing Street System**

The Project Site is located on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue in the Hollywood Community of Los Angeles, approximately five miles northwest of Downtown Los Angeles. The Project Site vicinity is highly urbanized and generally built-out. It is located within a part of the active regional center of Hollywood, which has a mix of commercial, studio/production, office, entertainment, and residential uses. The Project Site is served by a network of regional transportation facilities, which are discussed in more detail below.

#### *(a) Regional Transportation System*

##### *(i) Freeways*

Primary regional access to the Project Site is provided by the Hollywood Freeway (US 101), which is located approximately 200 to 300 feet north of the Project Site depending on the specific Project Site location. Freeways are under the jurisdiction of Caltrans.

##### *(b) Roadways*

The streets in the vicinity of the Project Site are under the jurisdiction of the City of Los Angeles. The following describes the streets in the vicinity of the Project Site:

Franklin Avenue is a designated Avenue II that provides lanes of travel in the east-west direction and is located approximately 600 feet north of the Project Site. Franklin Avenue provides four travel lanes with left-turn lanes at intersections. Parking is generally provided on both sides of the street.

Yucca Street borders the north of the Project Site and is a designated Avenue II between Cahuenga Boulevard and Vine Street and a Local Street elsewhere, including in front of the Project Site. Yucca Street has lanes of travel in the east-west direction and provides two travel lanes with a center left-turn lane between Cahuenga Boulevard and Vine Street. Parking is provided on both sides of the street.

Hollywood Boulevard is a designated Avenue I that provides lanes of travel in the east-west direction and is located approximately 600 feet south of the Project Site. Hollywood Boulevard provides four travel lanes and a center left-turn lane at intersections. Metered parking is generally provided on both sides of the street.

Sunset Boulevard is a designated Avenue I that provides lanes of travel in the east-west direction and is located approximately one half-mile south of the Project Site. Sunset Boulevard provides six travel lanes with a center left-turn lane at intersections. Metered parking with peak hour restrictions is generally provided on both sides of the street.

Cahuenga Boulevard is a designated Avenue II south of Yucca Street and a designated Avenue I north of Yucca Street that provides lanes of travel in the north-south direction and is located approximately one quarter-mile west of the Project Site. Cahuenga Boulevard provides four travel lanes and provides a center left-turn lane north of Yucca Street. Unmetered parking is generally provided on both sides of the street.

Vine Street is a designated Avenue II that provides lanes of travel in the north-south direction and is located approximately 500 feet west of the Project Site. Vine Street provides four travel lanes and a center left-turn lane at intersections. Metered parking is generally available on both sides of the street.

Argyle Avenue is a designated Local Street that provides lanes of travel in the north-south direction and is located along the western border of the Project Site. Argyle Avenue provides two travel lanes and a left-turn lane at intersections. Metered parking is generally provided on both sides of the street.

Gower Street is a designated Avenue III that provides lanes of travel in the north-south direction and is located approximately 400 feet east of the Project Site. Gower Street provides two travel lanes and a center left-turn lane at intersections. Metered parking is generally available on both sides of the street.

Bronson Avenue is a designated Avenue III that provides lanes of travel in the north-south direction and is located approximately one third mile east of the Project Site. Bronson Avenue provides two travel lanes and a center left-turn lane at intersections. Unmetered parking with peak hour restrictions is generally provided on both sides of the street.

#### (c) *Public Transit*

The Project Site is located in an area served by bus lines operated by Metro and LADOT's Downtown Area Shuttle (DASH). **Figure IV.L-1, *Existing Transit Service***, illustrates the existing transit service in the Project vicinity. The following is a summary of the bus lines providing service in the Project Site vicinity:





Metro Red Line subway operates in the Project vicinity and runs between North Hollywood and Downtown Los Angeles, connecting with the Metro Orange Line in North Hollywood, the Metro Purple Line at Wilshire Boulevard, the Metro Blue Line and Metro Expo Line in Downtown Los Angeles, and the Metro Gold Line at Union Station. In the Project Site vicinity, the Metro Red Line has a station at Hollywood Boulevard and Vine Street, the entrance to which is located approximately 600 feet (0.1 miles) from the Project Site. The Metro Red Line had an annual ridership in 2017 of 44,861,106 people.<sup>24</sup>

Metro Local 2 travels from Downtown Los Angeles to Pacific Palisades and provides service to Hollywood, West Hollywood, and Westwood. The line travels along Sunset Boulevard, which is located approximately 1,500 feet (0.3 miles) south of the Project Site.

The Metro Local 2 combined with Line 302 (travels from Downtown Los Angeles to Pacific Palisades) had an annual ridership in 2017 of 4,609,963 people.

Metro Local 180/181 is a local line that travels from Hollywood to Pasadena via Los Feliz Boulevard and Colorado Boulevard. Route 180 continues to Altadena, while Route 181 ends in east Pasadena and Sierra Madre. Both routes provide service to the Hollywood/Vine Metro Red Line Station, Glendale, Eagle Rock, and Pasadena, and travel along Hollywood Boulevard, which is located approximately 500 feet (0.09 miles) south of the Project Site. The Metro Local 180/181 had an annual ridership in 2017 of 3,093,178 people.

Metro Local 207 travels from Hollywood to Athens, and provides service to the Metro Green Line Crenshaw Station, the Metro Purple Line Wilshire/Western Station, and the Metro Red Line Hollywood/Western Station. The line travels along Franklin Avenue, which is located approximately 600 feet (0.11 miles) north of the Project Site. The Metro Local 207 had an annual ridership in 2017 of 6,383,909 people.

Metro Local 210 travels from the Metro Red Line Hollywood/Vine Station to Redondo Beach, and provides service to Torrance, the Metro Green Line Crenshaw Station, and the Metro Expo Line/Crenshaw Station. The line travels along Vine Street, which is located approximately 500 feet (0.1 miles) west of the Project Site. The Metro Local 210 had an annual ridership in 2017 of 3,859,063 people.

Metro Local 217 travels from the Metro Red Line Vermont/Sunset Station to Fairfax Avenue and Washington Boulevard and provides service to Los Feliz, Hollywood, and Culver City. The line travels along Hollywood Boulevard, which is located approximately 500 feet (0.1 miles) south of the Project Site. The Metro Local 217 had an annual ridership in 2017 of 2,164,117 people.

Metro Limited 302 travels from Downtown Los Angeles to Pacific Palisades and provides service to Hollywood, West Hollywood, and Westwood and travels along Sunset

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<sup>24</sup> The annual ridership data presented in this section by the various Metro transit lines was obtained from <http://isotp.metro.net/MetroRidership/Index.aspx>, accessed July 2018.

Boulevard, which is located approximately 1,850 feet (0.35 miles) south of the Project Site. The Metro Local 302 combined with Line 2 had an annual ridership in 2017 of 4,609,963 people.

Metro Rapid 757 travels from Hollywood to Hawthorne, and provides service to the Metro Green Line Crenshaw Station, the Metro Purple Line Wilshire/Western Station, and the Metro Red Line Hollywood/Western Station. The line travels along Western Avenue, which is located approximately 7,010 feet (0.85 miles) east the Project Site. The Metro Rapid 757 had an annual ridership in 2017 of 3,126,996 people.

Metro Rapid 780 travels from Washington Boulevard and Fairfax Avenue to Pasadena and provides service to Los Feliz, Glendale, and Eagle Rock. The line travels along Hollywood Boulevard, which is located approximately 500 feet (0.1 miles) south of the Project Site. The Metro Rapid 780 had an annual ridership in 2017 of 2,079,022 people.

LADOT DASH Beachwood Canyon travels from the Metro Red Line Hollywood/Vine Station to Beachwood Drive and Westshire Drive, and provides a stop adjacent to the Project Site at the intersection of Argyle Avenue and Yucca Street.

LADOT DASH Hollywood travels in a loop through Hollywood and travels generally on Franklin Avenue to the north, Vermont Avenue to the east, Fountain Avenue to the south, and Highland Avenue to the west. The LADOT DASH Hollywood provides a connection to the Metro Red Line Hollywood/Highland, Hollywood/Vine, Sunset/Vermont, and Santa Monica/Vermont Stations, and passes along Argyle Avenue adjacent to the Project Site.

LADOT DASH Hollywood/Wilshire travels from the Metro Purple Line Wilshire/Western Station to the Metro Red Line Hollywood/Vine Station, and provides service to Koreatown and Hollywood with stops at Argyle Avenue and Hollywood Boulevard, which is located approximately 500 feet (0.1 miles) south of the Project Site.

## (2) Existing Site Access

The access to the existing single-family residence, which is located on the East Parcels of the Project Site, is from Vista del Mar Avenue. Access to the carports located at the rear of the Central and West Parcels is provided by two driveways on Yucca Street, with the westernmost driveway being one-way in and the easternmost driveway being one-way out. There is a separate fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue. The entrance to this secured surface lot is on Yucca Street and the vehicular exit is on Vista del Mar Avenue.

## (3) Existing Pedestrian and Bicycle Facilities

### (a) Pedestrian Facilities

The walkability of an area is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile; these attributes are quantified

by WalkScore.com and assigned a score out of 100 points.<sup>25</sup> With the various commercial businesses and cultural facilities located adjacent to the residential neighborhoods of the Hollywood community, the walkability of the Project Site is approximately 93 points<sup>26</sup> compared to the Citywide score of 67 points.

Existing sidewalks that provide access to the Project Site include those adjacent to the Project Site along Yucca, Argyle and Vista del Mar. These sidewalks connect to pedestrian crossings at intersections within the Project vicinity. Striped crosswalks are provided at most legs of nearby intersections.

### *(b) Bicycle Facilities*

Based on the 2010 Bicycle Plan, discussed above, the existing bicycle network consists of several types of bicycle facilities. Bicycle lanes are a component of street design, with dedicated striping that separates vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. By contrast, bicycle routes and bicycle-friendly streets are located on collector and lower volume arterial streets where motorists and cyclists share the roadway without dedicated striping for a bicycle lane.<sup>27</sup> Bicycle routes with shared lane markings, or “sharrows,” remind bicyclists to ride farther from parked cars to prevent collisions, make motorists aware of bicycles potentially in the travel lane, and show bicyclists the correct direction of travel.

There are designated bicycle facilities on several streets within the Project vicinity, including dedicated bicycle lanes, sharrows, and bicycle friendly streets as follows:

- Franklin Avenue east of Argyle Avenue (sharrows)
- Yucca Street west of Vine Street (Bicycle Friendly Street)
- Yucca Street between Vine Street and Argyle Avenue (sharrows)
- Selma Avenue (sharrows)
- Cahuenga Boulevard north of Yucca Street (bicycle lanes)
- Vine Street south of Yucca Street (sharrows)
- Argyle Avenue between Franklin Avenue and Selma Avenue (sharrows)

Mobility Plan 2035 redesignates the Bicycle Plan’s facilities based on the Bicycle Enhanced Network with a Low-Stress Bikeway System and a Bicycle Lane Network.

<sup>25</sup> <https://www.walkscore.com/methodology.shtml>, accessed November 7, 2017.

<sup>26</sup> WalkScore.com ([www.walkscore.com](http://www.walkscore.com)) rates the Project Site (6220 West Yucca) with a score of 93 of 100 possible points (scores accessed on February 17, 2020). 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.

<sup>27</sup> A bicycle route is defined in the 2010 Bicycle Plan as “A shared roadway specifically identified for use by bicyclists, providing a superior route based on traffic volumes and speeds, street width, directness, and/or cross-street priority, denoted by signs only. Caltrans refers to this facility as a Class III Bikeway – ‘Provides for shared use with pedestrian or motor vehicle traffic.’” A bicycle friendly street is defined as a Class III facility that “...will include at least two engineering street calming treatments in addition to signage and shared lane markings.”

Although some routes are incorporated into the Bicycle Enhanced Network, the Backbone Bikeway Network and Neighborhood Bikeway Network are relatively unchanged from the 2010 Bicycle Plan. Within the vicinity of the Project Site, bicycle lanes are proposed for Hollywood Boulevard, Sunset Boulevard, Cahuenga Boulevard, Yucca Street between Cahuenga Boulevard and Vine Street, and Vine Street south of Yucca Street. The 2010 Bicycle Plan also proposes amenities to create bicycle-friendly streets out of Franklin Avenue, Argyle Avenue north of Selma Avenue, Selma Avenue, and Carlos Avenue; however, there is currently no schedule for implementation of these bicycle lanes. Therefore, upon consultation with LADOT's bicycle section, no changes to vehicular lane configurations to accommodate potential new bicycle lanes were assumed in this analysis.<sup>28</sup>

### 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 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 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 in the 2006 L.A. CEQA Thresholds Guide (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.

<sup>28</sup> Traffic Study, Gibson Transportation Consulting, Inc., pages 32-33.

## (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 indicate 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.
- 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.
- For regional serving retail, entertainment projects, and/or event centers the project would result in a net increase in VMT.
- For other land use types, excluding retail uses, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee in the APC in which the project is located.
- For mixed-use projects, evaluate each project land use component separately using the criteria in the above bullets. Note, no separate evaluation is needed for the total sum retail components of a project that are under 50,000 square feet.

Since the Project is mixed-use and would include residential, hotel, and retail/restaurant uses, the residential and office/other land use types thresholds apply. The Project Site is located within the Central APC area, which has an average daily household VMT per capita of 6.0 and an average daily work VMT per employee of 7.6.<sup>29</sup>

(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.<sup>30</sup> 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.
- 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 the Project's transportation impacts considers potential effects related to: 1) conflicts with transportation-related plans, ordinances or policies; 2) a substantial increase in vehicle miles traveled (VMT); 3) increased hazards due to a geometric design feature or incompatible use; and 4) emergency access.

The scope of the analysis, the base assumptions and VMT technical methodologies were completed in accordance with the TAG. The subsections below describe the methodologies to evaluate each significance threshold.

<sup>29</sup> LADOT, Transportation Assessment Guidelines, Table 2.2-1, 2019. Available at: [https://ladot.lacity.org/sites/g/files/wph266/f/TA\\_Guidelines\\_%2020190731.pdf](https://ladot.lacity.org/sites/g/files/wph266/f/TA_Guidelines_%2020190731.pdf). Accessed February 2020.

<sup>30</sup> 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. Available at: [https://ladot.lacity.org/sites/g/files/wph266/f/LACITYP\\_123016-DRIVEWAY%20DESIGN.PDF.pdf](https://ladot.lacity.org/sites/g/files/wph266/f/LACITYP_123016-DRIVEWAY%20DESIGN.PDF.pdf). Accessed February 2020.

## (1) Review for Conflicts with Plans, Programs, Ordinances, or Policies

TAG Table 2.1-2, *Questions to Determine Project Applicability to Plans, Policies and Programs*, provides screening questions to determine plans, programs, ordinances and policies that may be applicable to a project. Gibson Transportation Consulting, Inc. completed the screening, which is provided as Table 1 in the CEQA Thresholds Transportation Memorandum contained in Appendix L-1 of this Draft EIR. 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.<sup>31</sup>

In addition, potential impacts to the Los Angeles Unified School District's Safe Routes to Schools were evaluated in light of the proximity of the Project Site to the Cheremoya Avenue Elementary School.

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. Residents contribute to household VMT and employees (including hotel, retail, and restaurant employees) contribute to work VMT. The thresholds and analysis are based on specific types of one-way trips, including:

<sup>31</sup> 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*))



- Home-Based Work Production: trips to a workplace destination originating from a residential use at the Project Site
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use at the Project Site
- Home-Based Work Attraction: trips to a workplace destination at the Project Site originating from a residential use

Other types of Project-generated trips, including Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use at the Project site), Home-Based Other Attraction (trips to a non-workplace destination at the Project site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project site originating from a non-residential use), are not factored into the household VMT per capita and work VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment.

The VMT Calculator accounts for a variety of sociodemographic, land use, and built environment factors estimated for each census tract within the City as well as the interaction of land uses within a mixed-use development. Some of the key factors built into the VMT Calculator include travel behavior zones, mixed-use development methodology, population and employment assumptions, and TDM measures that would be provided as project design features or incorporated as mitigation measures. 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.<sup>32</sup>

**Travel Behavior Zones (TBZs).** The City developed TBZs as part of a framework for determining the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. TBZs were designated in each Census tract throughout the City considering population density, land use density, intersection density, and proximity to transit. TBZs are categorized as Suburban (Zone 1), Suburban Center (Zone 2), Compact Infill (Zone 3, and Urban (Zone 4). The VMT Calculator determines a project's TBZ based on the latitude and longitude of a project address. The TBZ for the Project Site is Compact Infill (Zone 3), which is higher density neighborhood that includes multi-story buildings and well-connected streets.

**Mixed-Use Development Methodology.** The VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for a project area:

- The project location's jobs/housing balance, which factors into how many trips are local or internal to a mixed-use project

<sup>32</sup> City of Los Angeles, Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation. Available at: [https://planning.lacity.org/odocument/3717c045-9ac2-48ff-9dfe-b2c97a59f07c/VMT\\_Calculator\\_Documentation\\_20190228.pdf](https://planning.lacity.org/odocument/3717c045-9ac2-48ff-9dfe-b2c97a59f07c/VMT_Calculator_Documentation_20190228.pdf). Accessed February 2020

- Land use density where the project is located, which factors into the likelihood of short trips as well as walking and bicycling
- Transportation network density, which affects the circuitry of travel (whether driving, walking, or bicycling) and, therefore, affects both trip length and the likelihood of choosing non-automobile modes of travel
- Proximity to transit, which affects the likelihood that residents or employees will travel via transit rather than automobile
- Proximity to retail and other destinations, affecting the likelihood that residents or employees will take short trips or non-automobile modes for routine commercial activities
- Vehicle ownership rates, with higher levels of vehicle ownership leading to a higher rate of automobile trips
- Household size, which affects both the number of trips made by a given residential unit (increasing or decreasing overall VMT) but also affects the number of people when calculating the daily VMT per capita

**Trip Lengths.** The VMT Calculator estimates trip lengths to and from a Project site based on information from the City's Travel Demand Forecasting Model. The model considers the traffic analysis zone where a project is located to determine the trip length and trip type, both of which factor into the calculation of a project's VMT.

**Population and Employment Assumptions.** The VMT Calculator contains population assumptions based on Census data and employment assumptions derived from multiple data sources.<sup>33</sup> A summary of population and employment assumptions for various land uses is provided in Table 1 of the VMT Calculator Documentation. Based on the VMT Calculator the Project would result in a resident population of 473 people and an employee population of 111 workers.

**TDM Measures.** The VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures.<sup>34</sup> The following seven categories of TDM strategies are included in the VMT Calculator:

1. Parking
2. Transit

<sup>33</sup> Data sources include the *2012 Developer Fee Justification Study* (Los Angeles Unified School District, 2012), *Trip Generation, 9th Edition* (Institute of Transportation Engineers, 2012), the San Diego Association of Governments Activity-Based Model, the United States Department of Energy, and other modeling resources. A summary of population and employment assumptions for various land uses is provided in Table 1 of the VMT Calculator Documentation.

<sup>34</sup> California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010. Available at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>. Accessed August 2019. TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT.

3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement

TDM strategies within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in *Quantifying Greenhouse Gas Mitigation Measures* (California Air Pollution Control Officers Association, August 2010).

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 SCAG RTP/SCS. The 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. 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 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 SCAG 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 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 proposed 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 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.

### (5) Regional Transportation Facilities

In response to Caltrans' comment on the Notice of Preparation on December 21, 2015, additional analyses of Caltrans' facilities were conducted for informational purposes since it is not an analysis to determine significant impacts under CEQA or required under the TAG. The analysis prepared by Gibson Transportation Consulting, Inc. is included in the Traffic Study, which is provided in Appendix L-2 of this Draft EIR.

## c) Project Design Features

The following Project Design Features will be incorporated into the Project to minimize construction-generated disruptions:

**PDF-TRAF-1: Construction Traffic Management Plan.** A detailed Construction Traffic Management Plan including street closure information, detour plans, haul routes, and staging plans will be prepared and submitted to the Los Angeles Department of Transportation for review and approval. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities of the Project and other projects in the vicinity of the Project Site, if any, and will include, but not be limited to, the following elements as appropriate:

- Advanced notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction. Prohibition of construction-related vehicles, including construction worker parking on nearby residential streets.

- Temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. In the event of a lane or sidewalk closure, a worksite traffic control plan shall route traffic or pedestrians around any such lane or sidewalk closures.
- Maintenance of safe and convenient routes for pedestrians and bicyclists through such measures as alternate routing and protection barriers where appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to the nearby school.
- Scheduling of construction-related deliveries, haul trips, worker trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to the nearby school.
- Provision of detour plans to address temporary road closures during construction. Coordination of temporary road closures so as to occur outside of peak hours.
- Minimize queueing of haul trucks and construction-related vehicles on adjacent streets.
- Advanced notification of temporary parking removals and duration of removals.
- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.

**PDF-TRAF-2: Pedestrian Safety Plan.** The Project Applicant will plan construction and construction staging so as to maintain pedestrian access, including Safe Routes to Schools, on adjacent sidewalks throughout all construction phases. The Project Applicant will maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities will be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways will be provided where pedestrians are exposed to potential injury from falling objects. The Project Applicant will keep sidewalks open during construction except when it is absolutely required to close or block the sidewalks for construction staging. Sidewalks will be reopened as soon as reasonably feasible, taking construction and construction staging into account. In the event that multiple projects are under construction in the area simultaneously that would affect the same sidewalk(s), the Project Applicant will coordinate with LADOT to ensure pedestrian safety is maintained.

## 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?***

Based on the TAG screening criteria in Table 2.1-2, *Questions to Determine Project Applicability to Plans, Policies and Programs*, the following plans were reviewed for analysis: Mobility Plan 2035, Vision Zero, Hollywood Community Plan, Plan for a Healthy Los Angeles, Citywide Design Guidelines, Walkability Checklist, Mobility Hubs Reader's Guide, LADOT Manual of Policies and Procedures, LADOT Transportation Technology Strategy, and LAMC sections. 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 and there are no streetscape plans near the Project Site. In addition, LAMC Section 12.26J, TDM Ordinance does not apply since the Project would provide 12,570 square feet of non-residential floor area, which is below the requirement of 25,000 square feet of non-residential floor area.<sup>35</sup>

The analysis below includes a consistency analysis with only the plans, policies and programs determined to be applicable to the Project.

### (a) Mobility Plan 2035

Mobility Plan 2035 includes numerous policies that are applicable to development associated with the Project. **Table IV.L-1, *Consistency of the Project With Applicable Policies of Mobility Plan 2035***, provides an analysis of whether the Project would conflict with any of the applicable policies in Mobility Plan 2035. As shown therein, the Project would not conflict with any of the applicable policies.

With regard to programs identified in Mobility Plan 2035, the Project would support the goals of Programs C.5, Citywide Active Transportation Map, C.7, Multi-Modal Access Campaign, and C.8, Neighborhood Network and Business District Maps, through the educational efforts that would occur as part of the TDM Program that is required in MM-TRAF-1. Program MG.7, Transportation Management Organizations, would be supported by the Project with participation in the Hollywood TMO as a member, if and when the TMO is established. The Project would support PK.14, Unbundled Parking Options, through the implementation of the TDM Program required under MM-TRAF-1. The Project would also support PL.2, Local Access, and PL.3, Mixed-Use, by developing a mix of residential and hotel uses along with ground-floor retail and restaurant space.

<sup>35</sup> Hotel guest rooms are considered residential floor area.

**TABLE IV.L-1**  
**PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF MOBILITY PLAN 2035**

<b>Policy/Issue</b>	<b>Would the Project Conflict?</b>
<p><b>2.1 – Adaptive Reuse of Streets.</b> Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.</p>	<p><b>No Conflict.</b> The Project would not conflict with the use of streets in the area. However, 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.</p>
<p><b>2.3 – Pedestrian Infrastructure.</b> 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.</p>	<p><b>No Conflict.</b> Pedestrian access to the commercial/restaurant uses would be provided from various at-grade sidewalks along Argyle Avenue, Yucca Street, and Vista Del Mar Avenue. Sidewalk widths along Yucca and Vista Del Mar would be increased compared to existing conditions. Along Argyle, the existing sidewalk width is approximately 12 feet, which would be decreased to widths of approximately 9.5 feet. However, if the waiver were approved, a narrowed sidewalk would not cause pedestrian capacity constraints on Argyle Avenue. Based on the Highway Capacity Manual, a 4-foot wide sidewalk can accommodate up to 1,000 pedestrians an hour without adversely affecting the flow.<sup>36</sup> Therefore, the narrowed sidewalk could accommodate future pedestrian volumes resulting from the Project and other surrounding development. In addition, street trees would be planted along Yucca Street, Argyle Avenue and Vista Del Mar Avenue, which would enhance the pedestrian environment. The Project's pedestrian features would integrate into and with the adjacent pedestrian network to maintain connections with multimodal facilities.</p>
<p><b>2.4 – Neighborhood Enhanced Network.</b> Provide a slow speed network of locally serving streets.</p>	<p><b>No Conflict.</b> Argyle Avenue, Yucca Street, and Vista del Mar are part of the City's NEN. Streets indicated as part of the NEN 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. As set forth in the Traffic Study provided in Appendix L-2, Argyle Avenue and Yucca Street currently exceed 1,500 vehicles per day while Vista del Mar is below 1,500 vehicles per day. While the Project would contribute vehicles to these streets, the Project is not proposing any changes along these streets that would prevent the City from installing additional features as part of the NEN, if determined to be necessary. In addition, the Project would not modify these streets in a way that would substantially increase travel speeds on these roadways. Rather, the Project would enhance the pedestrian experience and would provide bicycle parking in support of alternate modes of transportation.</p>

<sup>36</sup> Transportation Research Board, Highway Capacity Manual, 6<sup>th</sup> Edition, 2016, Chapter 18 (Urban Street Segments), Section 4 (Pedestrian Methodology), page 18-42, 2016.

**Policy/Issue****Would the Project Conflict?**

**2.6 – Bicycle Networks.** Provide safe, convenient, and comfortable local and regional bicycling facilities<sup>37</sup> for people of all types and abilities.

**No Conflict.** Existing bikeways are located on Argyle Avenue, Franklin Avenue, and Yucca Street to the west of Argyle Avenue in the Project Site vicinity. Although the City's Mobility Plan 2035 does not yet have a schedule for implementation, Hollywood Boulevard is designated as a Tier 1 Protected Bicycle Lane within the Bicycle Network. A Tier 2 Bicycle Lane is shown on Vine Street as well as extending the bicycle lane on Yucca Street west to Highland Avenue. Consistent with LAMC Section 12.21A.16 the Project would provide 258 bicycle parking spaces. Bicyclists would have the same access opportunities to the Project Site as pedestrians. Bicycle access would be shared with the vehicular access, other than some short-term bicycle parking along the sidewalk on Yucca Street. The Project would include facilities to support bicycling and would not adversely affect the planned bicycle network. The Project would not conflict with the provisions of Mobility Plan 2035.

**2.7 – Vehicle Network.** Provide vehicular access to the regional freeway system.

**No Conflict.** Yucca Street and Argyle Avenue would continue to provide access to the regional freeway system, particularly US-101 located approximately 200 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.

**2.10 – Loading Areas.** Facilitate the provision of adequate on and off-site street loading areas.

**No Conflict.** Commercial loading activities for the residential, hotel and commercial/restaurant uses would occur within the P1 Level of Building 1 in a designated 910 square-foot loading area near the parking entrance off of Argyle Avenue (see Figure II-4). The loading would occur on-site and would not interfere with traffic flow. Therefore, the Project would not conflict with this policy.

**2.17 – Street Widening.** Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.

**No Conflict.** The existing required street widths are met or exceeded on Yucca Street and Argyle Avenue. However, the Project includes a waiver request (LAMC Section 12.37) to be relieved of widening Vista Del Mar Avenue to current standards. Vista Del Mar Avenue currently has a 28 foot right of way. The buildings south of the Project Site on Vista Del Mar Avenue are contributors to the Vista Del Mar-Carlos Historic District. The 20-foot road provides a 10-foot travel lane in each direction and four-foot wide sidewalks on either side. Since the buildings to the south are contributors it is unlikely that the street and sidewalk would be widened to meet applicable standards. The Project would widen the sidewalk along Vista Del Mar to 6 feet thereby increasing pedestrian comfort. Based on the Highway Capacity Manual, a 4-foot wide sidewalk can accommodate up to 1,000 pedestrians an hour without adversely affecting the flow.<sup>38</sup> Therefore, with the increase in sidewalk width the pedestrian volumes could be accommodated. Therefore, the Project would not conflict with the City's long-term mobility planning and needs.

<sup>37</sup> Bicycling facilities are ideally suited for a host of slow moving modes including but not limited to scooters, skateboards, rollerblading, rideables and other future compact personal transportation technologies.

<sup>38</sup> Transportation Research Board, Highway Capacity Manual, 6<sup>th</sup> Edition, 2016, Chapter 18 (Urban Street Segments), Section 4 (Pedestrian Methodology), page 18-42, 2016.



**Policy/Issue****Would the Project Conflict?**

**3.1 – Access for All.** Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City’s transportation system.

**No Conflict.** The Project would widen the sidewalk along Yucca Street and Vista Del Mar Avenue. As discussed above, the Project includes a waiver request to be relieved of widening Vista Del Mar Avenue to current standards in all locations. With regard to Argyle Avenue, while the Project proposes a reduction in sidewalk between public and private dedicated sidewalks the sidewalk width would be approximately 9’-6” to 9’-9” along Argyle Avenue. Narrowed sidewalks, if the waivers are approved, would not cause pedestrian capacity constraints on Argyle Avenue or Vista Del Mar Avenue based on the Highway Capacity Manual and in light of existing pedestrian volumes or future volumes after increases from the Project and other surrounding development. In addition, the Project would provide long-term and short-term bicycle parking. Vehicular access would also be provided. Thus, the Project would support alternate means of transportation.

**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 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 include bicycle parking that meets LAMC requirements. Streetscape, landscape and lighting improvements would enhance pedestrian activity and walkability in and around the Project Site. The provision of pedestrian and bicycle accessibility would serve to improve first/last mile access to 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 long term and short term bicycle parking consistent with the City’s Bicycle Parking Ordinance.

**4.8 – Transportation Demand Management Strategies.** Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.

**No Conflict.** While the TDM Ordinance would not apply to the Project, the Project would implement a TDM Program in accordance with MM-TRAF-1, which would serve to reduce VMT impacts to a less than significant level. The TDM measures 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.** Parking would be provided on-site Building 1, located at the southeast corner of Yucca Street and Argyle Avenue, would include a six-level podium parking structure with two fully subterranean levels (P3 and P2 Levels); two semi-subterranean levels (P1 and L1 Levels – due to Project Site’s sloping topography); and two entirely above-ground levels (L2 and L3). The outside wall surfaces of the parking podium would include solid panels and would also be overlain in some areas with tinted metal rods placed at slight angles to create a vertical screen so that the parking would not detract from the neighborhood’s visual quality. Further, parking would not be free (i.e., unbundled) in accordance with MM-TRAF-1 so as to discourage automobile trips and make alternative modes of transportation more attractive.

**Policy/Issue****Would the Project Conflict?****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 physically active transportation choices and choices that are more environmentally sustainable by providing convenient access to walking, biking and transit options in and around the Project Site. The Project would provide 258 bicycle parking spaces, which is consistent with the number required by LAMC Section 12.21.A.16. In addition, the Project would provide adequate sidewalks and provide street trees, which would enhance the pedestrian experience.

**5.2 – Vehicle Miles Traveled.** Support ways to reduce VMT per capita.

**No Conflict.** A VMT analysis was conducted for the Project and is summarized under Threshold b) below. The Project would incorporate MM-TRAF-1, which requires the implementation of a TDM Program to ensure that VMT resulting from the Project would be below the VMT thresholds of significant for the Central APC. As required by MM-TRAF-1, the Project would incorporate unbundled parking and a promotions and marketing component. The unbundled parking means that parking spaces for residents would be leased separately from dwelling units, thereby explicitly exposing residents to the cost of parking and giving them the option not to pay for parking. The unbundled parking is designed to reduce auto ownership and encourage the use of alternative modes of transportation. The promotions and marketing component would provide employees and residents with materials and promotions encouraging use of alternative modes of transportation. This type of campaign helps to raise awareness of the options available to people who may never consider any alternatives to driving. The TDM measures would collectively serve to reduce VMT per capita.

**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 provide electric vehicle charging in the parking structure. PDF-GHG-2 requires that at least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). In addition, PDF-GHG-3 requires that at least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations.

**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 Gibson Transportation Consulting, Inc. (traffic consultant) as part of the CEQA Thresholds Transportation Memorandum (see Appendix L-1) and compared to existing and future conditions resulting from the Project. As discussed above under Policies 2.17 and 3.1, the existing required street widths are met or exceeded on Yucca Street and Argyle Avenue. However, the Project includes a waiver request (LAMC Section 12.37) to be relieved of widening Vista Del Mar Avenue to current street width standards. Vista Del Mar Avenue currently has a 28 foot right of way (with a 10-foot travel lane in each direction and four-foot wide sidewalks on either side). The buildings south of the Project Site on Vista Del Mar Avenue are contributors to the Vista Del Mar-Carlos Historic District and therefore, it is unlikely that the street and sidewalk would be widened in the future to meet applicable standards. With regard to sidewalks, the Project would widen the sidewalk along Yucca Street. The Project would also

**Policy/Issue****Would the Project Conflict?**

widen the sidewalk along Vista Del Mar from 4- to 6-feet. In addition, the Project proposes a reduction in sidewalk width along Argyle Avenue. As discussed above under Policies 2.17 and 3.1, the proposed sidewalk widths along the street frontages would not cause pedestrian capacity constraints based on existing pedestrian volumes or future volumes after increases from the Project and other surrounding development. Therefore, it was determined that the Project would not conflict with street designations and classifications.

SOURCE: ESA, 2019.

*(b) Vision Zero*

As indicated previously, the High Injury Networks in the Project vicinity include Hollywood Boulevard, Vine Street, Yucca Street west of Argyle Avenue, and Franklin Avenue east of Beachwood Drive. In 2019, LADOT installed continental crosswalks at several intersections along Hollywood Boulevard, including at Cahuenga Boulevard, Ivar Avenue, and El Centro Avenue near the Project Site, as part of the Hollywood Boulevard Safety Improvements Project. No Vision Zero improvements are currently planned near the Project Site. The Project would not preclude future Vision Zero safety improvements by the City. Thus, the Project would not conflict with Vision Zero.

*(c) Hollywood Community Plan*

The Project would be consistent with the objectives of the Hollywood Community Plan as the Project would contribute to the development of Hollywood as a major center of population, employment, and retail services. The Project would result in a high-density mix of uses that are consistent with the General Plan in a location with adjacent, similarly scaled towers. The Project would be consistent with the Plan's objectives related to developing additional commercial uses in appropriate locations, providing adequate public services, utilities, and open space to meet anticipated demands, and coordinating land use with transportation planning through its location within a City Transit Oriented Community. In line with these objectives, the Project would increase housing and jobs in proximity to the Metro Red Line, other regional Metro bus lines, and LADOT DASH lines. With regard to compatibility with surrounding development including historic resources, the Project would provide appropriate transitions from Building 2 to the adjacent Historic District to the south. Building 2 would create a height transition between the Historic District and the 20-story Building 1, and a buffer between the taller Building 1 and the one- and two-story Historic District residences. Furthermore, the Project would activate street frontages and would provide sidewalk improvements that would enhance the pedestrian experience and would promote pedestrian travel. In addition, the Project would include bicycle parking spaces for Project residents, employees, and visitors consistent with LAMC requirements.

(d) *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 street-facing commercial spaces which include patio dining adjacent to sidewalks. 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, with implementation of MM-TRAF-1, the Project would incorporate a TDM program and participate in the Hollywood TMO, if and when it is established. The Project would not interfere with other policies recommended by the plan. Therefore, the Project would be consistent with Plan for a Healthy Los Angeles.

(e) *Citywide Design Guidelines*

The Project would promote the safety and comfort of pedestrians by activating ground-level frontages with street-level restaurant and retail space at the corner of Argyle Avenue and Yucca Street and along the Yucca Street frontage (including outdoor patio dining). The Project would also provide an inset curb pick-up/drop-off area along Yucca Street in front of the lobby. The Project would provide safe access through the full separation of vehicular access and pedestrian access. Project driveways would be located a sufficient distance from adjacent intersections 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.

(f) *Walkability Checklist*

As previously described, the Project Site is located in a neighborhood with a moderate amount of pedestrian activity that also rates high for general walkability. Consistent with this rating, pedestrian patronage is anticipated at the Project. The Project would result in the retention of all sidewalks and pedestrian crosswalks adjacent to the Project Site. The Project would enhance the pedestrian experience and would promote the safety and comfort of pedestrians with the location of ground level commercial uses at the corner of Argyle Avenue and Yucca Street and along Yucca Street, which would serve to activate the sidewalk. The additional sidewalk width along Yucca Street, though on private property, would be made publicly accessible through an easement or license and would, thus, be functionally indistinguishable from a sidewalk fully in the public right-of-way. The increase in sidewalk width along Yucca Street would provide space for patio dining which would contribute to the pedestrian environment. These features support the Walkability Checklist recommendations and serve to enhance the pedestrian experience.

(g) *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 retail and restaurant uses.

*(h) LADOT Manual of Policies and Procedures*

The Project would generally not interfere with any of the policies and procedures contained in the LADOT Manual of Policies and Procedures that address traffic infrastructure, such as roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes. However, the Project includes a waiver request (LAMC Section 12.37) to be relieved of widening Vista Del Mar Avenue to current standards based on unique circumstances. Vista Del Mar Avenue currently has a 28 foot right of way, with a 10-foot travel lane in each direction and four-foot wide sidewalks on either side. The buildings south of the Project Site on Vista Del Mar Avenue are contributors to the Vista Del Mar-Carlos Historic District and therefore, it is unlikely that the street and sidewalk would be widened in the future to meet applicable standards. With approval of the waiver request, the Project would comply with all applicable LADOT design standards.

*(i) LADOT Transportation Technology Strategy*

As indicated above, the LADOT Transportation Technology Strategy is designed to ensure the City stays on top of emerging transportation technologies as both a regulator and a transportation service provider. The Project would not interfere with any of the general policy recommendations, pilot proposals, or action steps set forth in the LADOT Transportation Technology Strategy and Technology Action Plan for implementation by the City.

*(j) Los Angeles Municipal Code*

Based on LAMC Section 12.21.A.16, the Project would require a total of 13 short-term and 128 long-term bicycle parking spaces for residential uses and 20 short-term and 20 long-term spaces for the commercial uses (hotel, retail, and restaurant). The Project would provide these spaces and thereby meet the LAMC requirements for on-site bicycle parking supply.

With regard to street dedication and improvement requirements, the Project Site has frontage on Argyle Avenue, Yucca Street, and Vista Del Mar Avenue, all of which are designated local streets in the Mobility Plan. Local streets have a designated width of 36 feet within a total ROW of 60 feet, thereby requiring 24 feet of sidewalks in total that can be met on either or both sides of the street, which typically would result in 12-foot sidewalks on both sides of the street. Currently, Argyle Avenue exceeds the required street width and provides 12-foot sidewalks. The Project proposes a reduction in sidewalk width to approximately 9'-6" to 9'-9" while maintaining the current road width along Argyle Avenue, which would require the City to waive the 12-foot sidewalk requirement for the Project. The Highway Capacity Manual states: "Pedestrian space reflects the level of crowding on the sidewalk. Pedestrian space typically only influences overall pedestrian LOS when pedestrian facilities are very narrow, pedestrian volumes are very high, or both. For example, with an effective sidewalk width of 4 feet, pedestrian volumes need to be in excess of 1,000 pedestrians per hour for the space-based pedestrian LOS to drop

below LOS A.”<sup>39</sup> Considering existing pedestrian volumes and the increase in pedestrians resulting from the Project, even with the narrowed sidewalk there would be sufficient capacity for pedestrians to move comfortably through the area.<sup>40</sup> However, in the absence of the grant of a waiver, the Project would have to provide the full 12-foot sidewalk. A narrowed sidewalk would not cause pedestrian capacity constraints on Argyle Avenue based on existing pedestrian volumes or future volumes after increases from the Project and other surrounding development.

Yucca Street exceeds the required street width but only provides 6-foot sidewalks. The Project would provide sidewalks exceeding 12 feet in width for the majority of the Project frontage onto Yucca Street with certain exceptions for architectural building projections in discrete locations. This additional sidewalk width, though on private property, would be made publicly accessible through an easement or license and would, thus, be functionally indistinguishable from a sidewalk fully in the public right-of-way. Thus, the Project would exceed the applicable street standard relative to sidewalks for the majority of the frontage on Yucca Street, only providing short sections of sidewalk with less width thereby complying with the intent of the ordinance.<sup>41</sup> Since the Project would meet the street standards for the entire Project frontage onto Yucca Street, and sidewalk standards for the majority of the Project frontage onto Yucca Street with a mix of public and private sidewalks with only a small portion of the frontage providing substandard sidewalks, the Project would not conflict with LAMC Section 12.37 and the City’s applicable street standards.

The right-of-way on Vista Del Mar Avenue is 28 feet, with 4-foot sidewalks adjacent to the Project Site. The remainder of the block to the south consists of contributor properties to the Vista Del Mar – Carlos Historic District. As part of a historic district, it is not reasonably foreseeable that the adjacent properties would be redeveloped. Therefore, it is not foreseeable that the entire sidewalk and street would be widened to meet the applicable street standards. The maintenance and protection of historic resources and settings provides a basis under LAMC Section 12.37 upon which the City may grant a waiver of dedications or improvements under most recent applicable street standards that may differ from the existing historic setting, where policy considerations strongly favor the protection and maintenance of historic resources. These circumstances present a common justification for a waiver by the City. The Project also would provide a 15-foot front yard between the public right-of-way and the porch of Building 2, consistent with the historic setbacks on the street, and would provide vehicular ingress and egress off of Yucca Street away from Vista Del Mar Avenue. The 20-foot wide road, providing 10 feet

<sup>39</sup> Transportation Research Board, Highway Capacity Manual, 6<sup>th</sup> Edition, 2016, Chapter 18 (Urban Street Segments), Section 4 (Pedestrian Methodology), page 18-42, 2016.

<sup>40</sup> Based on Project counts taken at Yucca and Argyle, there are less than 100 pedestrians on the Argyle sidewalk during the peak times. While the Project would increase pedestrians in the area, using a conservative average vehicle ridership (AVR) of 1.5 persons and the Project’s net transit reduction of less than 50 cars per hour, the Project would result in 75 additional pedestrians in the area.

<sup>41</sup> A waiver may also be requested for the limited substandard portion of the sidewalk, if determined to be necessary by the City. The areas in which the sidewalk would be less than 12 feet would be approximately 27 linear feet at the corner of Yucca Street and Argyle Avenue and two other locations to the east equaling approximately 13 linear feet for a total of approximately 40 discontinuous linear feet.

of space in each direction for cars, and proposed 6-foot sidewalks, would provide sufficient means of vehicular and pedestrian travel based on existing pedestrian volumes or future volumes after increases from the Project and other surrounding development. Therefore, the Project would not conflict with the City's long-term mobility planning or needs with regard to the Vista Del Mar right-of-way.

With approval of the requested waivers, the Project would be consistent with the City's requirements and applicable street standards under LAMC Section 12.37 and the Mobility Plan. If any waiver request is denied by the City, the Project Applicant must dedicate or improve as deemed to be required to meet the applicable street standard.

*(k) Other*

During the scoping process LAUSD identified the Cheremoya Avenue Elementary School, located at 6017 Franklin Avenue, as a school located near the Project Site. This elementary school is located four blocks northeast of the Project Site. There would be no Project-related construction staging or road closures at or adjacent to this school. LAUSD's Safe Routes to School website shows that Yucca Street and Argyle Avenue north of the Project Site are included in the pedestrian routes to this school and that students may therefore pass the Project Site on foot, and use street crossings in the Project Site's vicinity, and that these roadways may also be used for vehicular pick-up and drop-off at this school.<sup>42</sup> While the use of the public right-of-way along Yucca Street and Argyle Avenue during construction would require temporary rerouting of pedestrian traffic since the sidewalks fronting the Project Site would be closed, the Pedestrian Safety Plan (PDF-TRAF-2) would include measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). Also, per PDF-TRAF-1, a Construction Traffic Management Plan including street closure information, detour plans, haul routes, and staging plans will be prepared and submitted to the Los Angeles Department of Transportation for review and approval. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. Therefore, construction activities would not impede school drop-off and pick-up activities or the use of LAUSD's identified pedestrian routes to access Cheremoya Avenue Elementary School, or any other local school for which these routes may be used for access.

In summary and based on the above analysis, the Project would not conflict with adopted programs, plans, ordinances or policies addressing the circulation system. Therefore, impacts would be less than significant.

***Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

<sup>42</sup> LAUSD Office of Environmental Health & Safety, Pedestrian Routes to School: <http://lausd-oehs.org/saferoutestoschools.asp>. Accessed on October 8, 2017.

**Table IV.L-2, *Summary of Vehicle Miles Traveled***, provides a summary of the Project-generated VMT. As shown in Table IV.L-2, the Project is estimated to generate 12,607 daily VMT, which includes a home-based production daily VMT of 3,505 and a home-based work attraction daily VMT of 799.<sup>43</sup> Based on the estimate of 473 residents, the Project would generate an average household VMT per capita of 7.4, which would exceed the Central APC impact threshold of 6.0. With regard to the commercial component, based on the estimate of 111 employees, the Project would generate an average work VMT per employee of 7.2, which is less than the Central APC impact threshold of 7.6. **Therefore, the Project would result in a potentially significant impact for household VMT and a less than significant impact for the work VMT. However, with implementation of Mitigation Measure TRAF-1, described below, potentially significant impacts would be reduced to a less than significant level.**

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

The Project's proposed uses would be consistent and compatible with the current urban uses surrounding the Project Site. No sharp curves or new intersections would be created as part of the Project. Vehicular access to the Project Site would be provided via three driveways as follows: one driveway on Yucca Street to the ground level of Building 1, one driveway on Argyle Avenue to the P1 level of Building 1 (due to the lower grade of the street at that location), and one driveway on Vista Del Mar Avenue to the self-contained parking structure for Building 2. The Project would result in a reduction from the five driveways serving the existing uses within the Project Site. All three driveways would provide full access (i.e., accommodate both left and right ingress and egress turning movements) and would be designed per LADOT standards and would obtain LADOT approval. The location and design of these driveways are intended to minimize impacts to traffic flow, ensure pedestrian safety, and to accommodate sufficient capacity to prevent queuing in the right-of-way, and take into account the driveway locations and vehicular access of adjoining uses. The Project access locations would be designed to City standards so as to provide adequate sight distance, sidewalks, crosswalks, and movement controls that would meet the City's requirements to protect pedestrian and bicyclist safety.

<sup>43</sup> Residents contribute to household VMT and employees (including hotel, retail, and restaurant employees) contribute to work VMT. The thresholds and analysis are based on specific types of one-way trips.



**TABLE IV.L-2  
SUMMARY OF VEHICLE MILES TRAVELED**

<b>Project Information</b>	
<b>Project Land Uses</b>	<b>Size</b>
Multi-Family Housing	210 units
Hotel	136 rooms
Retail	3,450 sf
Restaurant	9,120 sf
<b>Project Analysis Characteristics<sup>a</sup></b>	
Resident Population	473
Employee Population	111
Project Area Planning Commission	Central
Project Travel Behavior Zone	Compact Infill (Zone 3)
<b>Project Analysis</b>	
Total Daily VMT	12,607 <sup>b</sup>
Home-Based Production VMT <sup>c</sup>	3,504
Home-Based Work Attraction VMT <sup>d</sup>	799
Household VMT Per Capita <sup>e</sup>	7.4
Impact Threshold	6.0
Significant Impact	<b>YES</b>
Work VMT per Employee <sup>f</sup>	7.2
Impact Threshold	7.6
Significant Impact	<b>NO</b>

## Notes:

<sup>a</sup> Project Analysis is from VMT Calculator output reports. Thus, resident and employee population numbers vary from those presented in Section IV. J, Population and Housing in this Draft EIR.

<sup>b</sup> Total daily VMT is the Project-generated total VMT generated by all trips, regardless of trip purpose, to and from the Project Site.

<sup>c</sup> Home-Based Work Production VMT are one-way trips to a workplace destination originating from a residential use at the Project Site.

<sup>d</sup> Home-Based Work Attraction VMT are one-way trips to a workplace destination at the Project Site originating from a residential use.

<sup>e</sup> Household VMT per capita is the total Home-Based VMT productions divided by the residential population of the project.

<sup>f</sup> Worker VMT per employee is the total Home-Based Work Attractions divided by the employment populations of the project.

SOURCE: City of Los Angeles VMT Calculator and VMT Calculator User Guide; Gibson Transportation Consulting, Inc., 2020.

The porte-cochere would accommodate the queueing of approximately three vehicles, enough to accommodate valet services and ridesharing services on typical days.<sup>44</sup> Before or after an event at the hotel, the demand at the porte-cochere could exceed the available space, but additional queueing could be accommodated on Yucca Street adjacent to the curb, out of the travel lane, when necessary. There is approximately 80 feet of shoulder that could accommodate approximately four cars. The majority of cars accessing the Project Site would proceed to the parking garage with a limited number of cars anticipated that would be needed for valet services or ridesharing services at one time. No sharp curves or new intersections would be created as part of the Project. The Project's proposed uses would be consistent and compatible with the current urban uses surrounding the Project Site.

Pedestrian access to Building 1 would be provided to the resident and hotel lobby on Yucca Street and directly into the various retail and restaurant storefronts from the sidewalks. Pedestrian access to Building 2 would be provided to the lobby at the corner of Vista Del Mar Avenue and Yucca Street. Bicycle access to the Project Site would be shared with the vehicular access, other than some short-term bicycle parking along the sidewalk on Yucca Street. Bicycle parking would primarily be located on the P1 level of each building's parking structure. The Project is designed to include an audible and visible warning system (an exit alarm) to indicate that vehicles are approaching the Yucca and Argyle driveways to exit, to alert pedestrians, bicyclists, and other drivers that a vehicle is exiting before that vehicle is visible from the street or sidewalk.

No unusual obstacles are presented in the design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. The driveway designs do not present significant safety issues regarding traffic/pedestrian conflicts. The driveways and internal circulation of parking areas, which would be refined during the building permit application process, would be designed according to Building Code and other LADOT standards to be reviewed by the City Department of Building and Safety, Bureau of Engineering, and, where appropriate, LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design.

The Project would provide a circulation plan that would accommodate vehicular traffic without impeding through traffic movements on City streets. Thus, impacts arising from hazards created by a Project design feature or incompatible Project uses would not occur. **Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.**

***Threshold (d): Would the Project result in inadequate emergency access?***

While construction-related vehicles would be traveling to/from the Project Site, for the reasons discussed above, traffic flow and access for emergency providers would be maintained throughout the course of construction activities. Construction activities would

<sup>44</sup> A Site access and circulation analysis was conducted by Gibson Transportation Consulting, Inc. and is provided in Chapter 12 of the Traffic Study, which is in Appendix L-2 of this Draft EIR.

be primarily contained within the Project Site's boundaries. Construction fences may temporarily encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. The curb lanes on Yucca Street and Argyle Avenue, which provide on-street parking in some areas, would be used intermittently throughout the construction period for activities such as equipment staging and concrete pumping. However, vehicular access to the project site and through the adjacent streets would be maintained during construction. If emergency access were necessary during construction, access would be facilitated through the use of sirens to clear a path and alert construction workers at the Project Site. Workers are trained to respond to emergency situations and would assist in providing the necessary access. **Thus, impacts regarding emergency access during construction would be less than significant.**

In addition, the Project's incorporation of a Construction Traffic Management Plan as described in PDF-TRAF-1 would further ensure that adequate emergency access is provided during construction. The Construction Management Plan would require the use of temporary traffic controls to direct traffic around any temporary street closures.

Project operation would generate traffic in the Project Site vicinity and Project development includes some modifications to access (i.e., new curb cuts for Project driveways) from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area would continue to be provided on Yucca Street, Argyle Avenue, and Vista Del Mar Avenue similar to existing conditions. None of these roadways that border the Project Site are designated by the City as emergency or disaster routes. As discussed above, direct vehicular access to the Project Site would be provided via three driveways as follows: one driveway on Yucca Street, one driveway on Argyle Avenue, and one driveway on Vista Del Mar Avenue. All three driveways would provide full access (i.e., accommodate both left and right ingress and egress turning movements), would be designed to LADOT standards and would be reviewed by LADOT staff. In addition, the Project is required to provide adequate emergency access including access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements. The Project would comply with LAFD requirements inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. LAFD approval of plot plans showing fire hydrants and access for each phase of the Project would be required prior to the recording of the final map for that phase. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the Project. Please see Section IV.K.1, *Fire Protection*, of this Draft EIR for more detailed discussion regarding emergency access relative to LAFD. With review and approval of Project Site access and circulation plans by the LAFD, the Project would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. **Operational impacts regarding emergency access would be less than significant.**

## e) Cumulative Impacts

As shown in **Table IV.L-3, *Related Projects Within One Quarter Mile of the Project Site***, eight related projects, which consist of a mix of residential, hotel, commercial, and office uses, are located within one quarter-mile of the Project Site.

**TABLE IV.L-3  
RELATED PROJECTS WITHIN ONE QUARTER MILE OF THE PROJECT SITE**

Name	Address	Description
BLVD 6200 Mixed-Use	6200 W Hollywood Bl	952 apartment units and 190,000 sf retail (Phase 1 Complete)
Yucca Street Condos	6230 W Yucca St	85 condominium units and 13,890 sf commercial
Hollywood Gower Mixed-Use	6100 W Hollywood Bl	220 apartment units and 4,580 sf retail
Pantages Theater Office	6225 W Hollywood Bl	214,000 sf office
Kimpton Everly Hotel Project	1800 N Argyle Ave	225 room hotel
Millennium Hollywood Mixed-Use Project (current Project proposed on this site is the Hollywood Center Project – see footnote below) <sup>45</sup>	1740 N Vine St	492 apartment units, 200 hotel rooms, 100,000 sf office, 35,000 sf fitness club, 15,000 sf retail, 34,000 sf restaurant
citizenM Hotel	1718 Vine St	216 hotel rooms and 4,354 sf restaurant
6140 Hollywood	6140 Hollywood Bl	102-room hotel, 27 condominium units, and 11,460 sf restaurant

SOURCE: Gibson Transportation Consulting, Inc., 2020.

The two nearest related projects are the Yucca Street Condos and the Argyle House Project. The Argyle House Project is located at the southwest corner of Yucca Street and Argyle Avenue and 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. Wide sidewalks have also been provided along its Yucca Street and Argyle Avenue frontages. The Kimpton Everly Hotel is located between the Project and

<sup>45</sup> At the time of preparation of the City approved list of related projects, the project at 1740 Vine Street was the Millennium Hollywood Mixed-Use Project. That Project has since been canceled, with the site currently being contemplated for the Hollywood Center Project, which is similarly also a high-rise mixed-use Project. The Hollywood Center Project is proposing approximately 872 dwelling units, 133 senior affordable units, approximately 30,200 square feet of retail uses, and nearly 34,000 square feet of public open space uses. Under a Hotel option, the Hollywood Center Project would replace 104 of the residential units with a 220-room hotel. Under either option, the contemplated mix-of uses would generate less traffic and corresponding traffic-related noise and air quality impacts than the Millennium Project primarily due to the removal of the office component. For purposes of this EIR analysis, the cumulative impacts analyses are based on the uses contemplated by the Millennium project, which again, results in a conservative assessment of traffic impacts. While it is acknowledged that the mix of uses varies, these variances do not materially change the findings in this EIR's cumulative impact analyses.

the Hollywood Freeway with vehicular access from Yucca Street. However, this related project provides street front amenities, including street trees, lighting, and sidewalks. Therefore, cumulatively the Project in combination with the related project would create a more pedestrian-friendly street front. 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. 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. In addition, each of the related projects would be separately reviewed and approved by the City and would be required to comply with City design requirements and LAMC requirements relative to street standards and improvements, bike parking, and safety. The review of these project would include an analysis of consistency with applicable plans, programs, policies, and ordinances. Collectively, the Project and the related projects would contribute to high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity that are planned for the area and therefore, would be consistent with City VMT reduction-related plans and goals. While the related projects are located within the Project vicinity, there is sufficient distance between the projects such that they collectively would not preclude but rather would promote the City's ability to serve transportation user needs through the collective location of higher density, transit-oriented uses within a designated job and population center well-served by multiple forms of transportation. Therefore, the Project, together with the related projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances. Accordingly, there would be no significant cumulative impacts to which both the Project and other nearby related projects contribute to in regards 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 Level of Significance After Mitigation section below, with the incorporation of MM-TRAF-1, 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.F, *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.

Also, with regards to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area with a surrounding roadway network that includes multiple routes in the area that are available 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 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 contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

## F) Mitigation Measures

The Project would generate an average household VMT per capita of 7.4, which exceeds the Central APC impact threshold of 6.0 and therefore, would result in a significant transportation impact. The following mitigation measure is recommended to address this impact.

**MM-TRAF-1: Transportation Demand Management Program.** The Project Applicant shall prepare and implement a comprehensive Transportation Demand Management (TDM) Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The TDM Program shall be subject to review and approval by the Department of City Planning and LADOT. A covenant and agreement shall be implemented to ensure that the TDM Program shall be maintained. The exact measures to be implemented shall be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The TDM Program shall ensure that the Project VMT would be below the applicable VMT threshold(s) established in the Transportation Assessment Guidelines through such means that could include monitoring or reporting, as

required by the City. The strategies in the TDM Program shall include at a minimum, the following:

- Unbundled Parking: Provision of unbundled parking for residents (i.e., parking space is leased separately from dwelling units); and
- Promotions and Marketing: Employees and residents shall be provided with materials and promotions encouraging use of alternative modes of transportation. This type of campaign would raise awareness of the options available to people who may never consider any alternatives to driving.

In addition, the TDM could include measures such as:

- Short-term car rentals;
- Incentives for using alternative travel modes (such as transit passes);
- Guaranteed ride home program for employees;
- Parking incentives and administrative support for formation of carpools/vanpools; and/or
- Participation as a member in the future Hollywood Transportation Management Organization (TMO), when operational. When the Hollywood TMO becomes operational, the Hollywood TMO's services may replace some of the in-house TDM services where applicable.

With regard to the Hollywood TMO referenced in MM-TRAF-1, the Hollywood community is a strong candidate for the promotion of alternative modes of transportation, including convenient walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc. A TMO is an organization that helps to promote these services to a community by providing information about available public transportation options and matching people into ridesharing services. The developers of various approved projects in the Hollywood Area, along with LADOT and stakeholders, have proposed to initiate the Hollywood TMO. Some of the TDM strategies could be enhanced through participation in the Hollywood TMO, once and if it becomes operational. As indicated above, once the Hollywood TMO becomes operational, the Hollywood TMO's services may replace some of the in-house TDM services where applicable.

MM-TRAF-1 is consistent with the City's policies on sustainability and smart growth and with LADOT's trip reduction and multi-modal transportation program. that support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, encouraging developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and providing efficient and effective traffic management and monitoring.

## g) Level of Significance After Mitigation

The identified mitigation measure MM-TRAF-1 would implement a TDM program that would result in vehicle trip reductions. The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in vehicle trip generation and VMT by offering services, actions, specific facilities, etc., aimed at encouraging the use of alternative transportation modes. The effectiveness of TDM programs can vary widely depending on the type and location of the project and the nature of the TDM components.<sup>46</sup> As shown in **Table IV.L-4, *Post-Mitigation Vehicle Miles Traveled***, with implementation of MM TRAF-1, the Project would generate 11,929 daily VMT (a reduction of 678 daily VMT), which includes a home-based production daily VMT of 2,862 and a home-based work attraction daily VMT of 796. With MM TRAF-1 the Project would generate an average household VMT per capita of 6.0 (1.4 less than prior to mitigation). With mitigation the Project would not exceed the household VMT per capita threshold of 6.0. Though the impact for work VMT for the Project would be less than significant without mitigation, the TDM program would further reduce the average work VMT per employee of 7.1. Thus, with MM-TRAF-1 the Project would meet the threshold criteria of being 15% less than the existing average household VMT per capita for the Central APC area and the household VMT impact would be reduced to a less than significant level.

<sup>46</sup> Trip Generation Handbook, 2nd Edition (Institute of Transportation Engineers, June 2004) provides a summary of research of TDM programs at different employers. At places that had the most comprehensive programs, including both economic incentives (e.g., transit passes, etc.) and support services, the programs resulted in an average of 24 percent reduction in commuter vehicles.



**TABLE IV.L-4  
POST-MITIGATION VEHICLE MILES TRAVELED**

Project Information		
Project Land Uses	Size	
Multi-Family Housing	210 units	
Hotel	136 rooms	
Retail	3,450 sf	
Restaurant	9,120 sf	
Project Analysis <sup>a</sup>		
Resident Population	473	
Employee Population	111	
Project Area Planning Commission	Central	
Project Travel Behavior Zone	Compact Infill (Zone 3)	
	Project before Mitigation	Project with Mitigation
Total Daily VMT	12,607 <sup>b</sup>	11,929 <sup>b</sup>
Home-Based Production VMT <sup>c</sup>	3,504	2,862
Home-Based Work Attraction VMT <sup>d</sup>	799	796
Household VMT Per Capita <sup>e</sup>	7.4	6.0
Impact Threshold	6.0	6.0
Significant Impact	YES	NO
Work VMT per Employee <sup>f</sup>	7.2	7.1
Impact Threshold	7.6	7.6
Significant Impact	NO	NO

**Notes:**

- a Project Analysis is from VMT Calculator output reports. Thus, resident and employee population numbers vary from those presented in Section IV. J, Population and Housing in this Draft EIR.
- b Total daily VMT is the Project-generated total VMT generated by all trips, regardless of trip purpose, to and from the Project Site.
- c Home-Based Work Production VMT are one-way trips to a workplace destination originating from a residential use at the Project Site.
- d Home-Based Work Attraction VMT are one-way trips to a workplace destination at the Project Site originating from a residential use.
- e Household VMT per capita is the total Home-Based VMT productions divided by the residential population of the project.
- f Worker VMT per employee is the total Home-Based Work Attractions divided by the employment populations of the project.

SOURCE: City of Los Angeles VMT Calculator and VMT Calculator User Guide; Gibson Transportation Consulting, Inc., 2020.

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## **IV. Environmental Impact Analysis**

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### **M. Tribal Cultural Resources**

#### **1. Introduction**

This section evaluates the Project's potential impacts on tribal cultural resources. The analysis of tribal cultural resources provided in this section is based on the tribal consultation process between the City and Native American groups in accordance with Assembly Bill (AB) 52, and more specifically, as prescribed in Public Resources Code (PRC) Sections 21080.3.1, 21080.3.2, and 21082.3. A summary of the consultation process for the Project is provided in the *Record Search Report and Tribal Consultation Summary for the Proposed 6220 West Yucca Street Project*, prepared by ESA, dated December 20, 2017, and provided in Appendix M of this Draft EIR. Appendix M additionally includes (a) the Native American Heritage Commission (NAHC) Sacred Lands Files Search and Native American Documentation report and (b) correspondence between the City of Los Angeles and the respective tribes in accordance with AB 52. The Records Search Report also provides some archaeological background information regarding the Project Site, such as the results of records searches conducted through the South Central Coastal Information Center and the NAHC, which is summarized in this section.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) California Environmental Quality Act**

###### **(a) Assembly Bill 52**

Assembly Bill (AB) 52 was approved by California State Governor Edmund “Jerry” Brown, Jr. on September 25, 2014. The bill 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. The primary intent of AB 52 was to include 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 CEQA, known as tribal cultural resources. On July 30, 2016, the California Natural Resources Agency adopted the final text for the tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

As set forth in subdivision (a) of PRC Section 21074, “tribal cultural resources” are either of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
  - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Subdivision (b) of PRC Section 21074 states that a cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Subdivision (c) of PRC Section 21074 states that a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed on or after July 1, 2015. 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 the 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<sup>1</sup> 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

<sup>1</sup> As defined in California Government Code Section 65352.4, “consultation” means the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party’s sovereignty. Consultation shall also recognize the tribes’ potential needs for confidentiality with respect to places that have traditional tribal cultural significance.

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, but has failed to provide comments to the lead agency, or has 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) Ethnography Background – The Gabrieliño**

The Project Site is located in the Gabrielino<sup>2</sup> tribal territory which, at the start of the Spanish Period (approximately around 1769), included the Los Angeles Basin and adjacent areas, and the San Clemente, Santa Catalina, and San Nicolas Islands. The tribe's mainland territory extended from the San Fernando Valley and the San Gabriel Mountains in the north to Aliso Creek and the Santa Ana Mountains in the south, and from Mount Rubidoux in the east to Topanga Canyon in the west. This territory included

<sup>2</sup> The Gabrielino (alternatively spelled Gabrieleño) are so called for their aggregation at the Mission San Gabriel Arcángel during the early Spanish Period. Currently, many Gabrielinos prefer the term Gabrielino-Tongva, or simply Tongva, or *Kizh*.

mountain, foothill, prairie, coastal zones, and the islands, which offered a variety of resources to Gabrielino foragers.

There were possibly more than 100 mainland villages and Spanish reports suggest that village populations ranged from 50 to 200 people.<sup>3</sup> Prior to actual Spanish contact, the Gabrielino population had been decimated by diseases, probably spread by early Spanish maritime explorers.<sup>4</sup> 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 was 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, in the southern end of the San Fernando Valley. The next closest village to the Project Site is the village of *Maungna*, once situated at the current location of Rancho Los Feliz, about 3.5 miles northeast of the Project Site.

The Gabrielino relied on gathered wild plants and trapped or hunted animals<sup>5</sup> for food. Acorns and piñon nuts were food staples found only in the mountains and foothills. On the islands and coast, marine resources, especially shellfish, fish, and sea mammals, greatly supplemented terrestrial resources. Plants also provided building material and raw material for craft manufacturing such as basket making. Animal bone, skin, fur, and feathers were also used as raw material for craft manufacturing. Whale bones were sometimes used in building windbreaks and houses. Certain types of stone were quarried and asphaltum<sup>6</sup> was gathered for tool and container manufacturing, and for waterproofing boats. Santa Catalina Island provided abundant steatite<sup>7</sup> which was valued as a raw material for bowls and an array of other items, notably body ornaments.

The Gabrielino interaction sphere was considerably larger than their tribal territory *per se*:<sup>8</sup>

*With the possible exception of the Chumash [their westward neighbors], the Gabrielino were the wealthiest, most populous, and most powerful ethnic nationality in aboriginal southern California, their influence spreading as far north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California.*

<sup>3</sup> Bean, Lowell J., and C. R. Smith, Gabrielino, in R. F. Heizer (editor) Handbook of North American Indians, Vol. 8, California, 1978, pages 538-549.

<sup>4</sup> Tac, Pablo, Conversion de los San Luisenos de Alta California, Proceedings of the 23rd International Congress of Americanists, 1930.

<sup>5</sup> Plants were not domesticated and domesticated animals were limited to dogs. Archaeological data collected to date does not suggest that dogs were used for food.

<sup>6</sup> Asphaltum is a tar-like substance that washes ashore from natural, undersea oil seepages.

<sup>7</sup> "Steatite" is a soft rock consisting largely of talc and also known as steatite.

<sup>8</sup> Bean, L. J., and C. R. Smith, 1978, Gabrielino. In: *Handbook of North American Indians*, Vol. 8, California. Robert F. Heizer, ed., pp. 538-549. Smithsonian Institution, Washington.

The Gabrielino spoke several dialects of a Cupan language in the Takic family, and neighboring tribes to the north, east, and south also spoke languages in the Takic family.<sup>9</sup>

Spain established two Franciscan missions in Gabrielino tribal territory: Mission San Gabriel Arcángel, founded in 1771 in the north-central Los Angeles Basin, and Mission San Fernando Rey de España, founded 1797 in the north-central San Fernando Valley. Prior to aggregation at the missions, the Gabrielino settlement pattern included primary villages and secondary camps; both villages and camps were situated alongside fresh waterways or springs.

During the Spanish and Mexican periods, from the time of the overland Portolá expedition until the culmination of the Mexican-American War, the Project Site was not far from the centers of population and commerce. El Pueblo de La Reina de Los Angeles, established in 1781, was about five miles to the southeast, and Mission San Gabriel was about 12 miles to the east.<sup>10</sup>

## (2) Resources Identified within the Project Site and Surrounding Area

### (a) *Methods*

As discussed in the Record Search Report and Tribal Consultation Summary and in compliance with the requirements of AB 52, the City sent notification and request to consult letters to nine (9) Native American individuals and organizations on the City's AB 52 Notification List on March 30, 2016, and conducted follow-up Native American consultation pursuant to AB 52. In particular, letters were sent via certified mail to the following California Native American tribes:

- Caitlin Gulley, Fernandeño Tataviam Band of Mission Indians
- Sandonne Goad and Samuel Dunlap, Gabrielino/Tongva Nation
- Linda Candelaria, Gabrielino-Tongva Tribe
- Andrew Salas, Gabrieleño Band of Mission Indians—Kizh Nation
- Robert Dorame, Gabrielino Tongva Indians of California Tribal Council
- Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians
- John Valenzuela, San Fernando Band of Mission Indians
- Joseph Ontiveros, Soboba Band of Luiseño Indians

<sup>9</sup> Shipley, W. F., 1978, Native Languages of California. In *Handbook of North American Indians*, Vol. 8, California. Robert F. Heizer, ed., pp. 80-90. Smithsonian Institution, Washington.

<sup>10</sup> Beck, W. A., and Y. D. Haase, 1974, *Historical Atlas of California*. University of Oklahoma Press, Norman.

These notification letters are included as an appendix to the Record Search Report and Tribal Consultation Summary.

Prior to the adoption of AB 52 and in association with the *Archaeological and Paleontological Resources Assessment for the Proposed 6220 West Yucca Street Project* (Archaeological and Paleontological Resources Assessment), a cultural resource records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, on July 2, 2015, which included a review of all recorded archaeological resources within a one-half mile radius of the Project Site, as well as a review of cultural resource reports and historic topographic maps on file. The records search at SCCIC included a review of the following resources: California Points of Historical Interest (CPHI), California Historical Landmarks (CHL), the California Register, the National Register of Historic Places, and the California Historic Resources Inventory System (CHRIS) listings. The records search would reveal whether previously recorded archaeological or built environment resources exist within or near the Project Site, that could potentially be considered as tribal cultural resources.

In addition, a Sacred Lands File (SLF) records search was conducted on August 15, 2015 through the Native American Heritage Commission (NAHC), with follow-up communications by ESA with Native American groups and/or individuals identified by NAHC as having affiliation with the Project Site vicinity. Each Native American group and/or individual identified by NAHC was sent a Project notification letter and map and was asked to communicate any knowledge regarding prehistoric or Native American resources (archaeological sites, sacred lands, or artifacts) located within either the Project Site or its vicinity. The letter included the Project Site location and a brief description of the Project. Results of the SLF search and follow-up communications were used to obtain information regarding additional prehistoric or Native American archaeological resources for which records may not be available at the SCCIC.

The Project Site is entirely developed and, as such, has no exposed native ground surface and no potential for surface exposure of resources. Thus, no field survey was conducted.

#### (b) Results

As part of the City's AB 52 consultation efforts, on April 12, 2016, the City received a letter via email from Caitlin Gulley, Director of the Tribal Historic and Cultural Preservation Department for the Fernandeño Tataviam Band of Mission Indians (Tribe) requesting formal consultation in accordance with AB 52. In this letter, Ms. Gulley also requested: 1) the estimated cubic yards of soil disturbance, and 2) all archaeological surveys and reports conducted within two miles of the Project Site. On June 13, 2016, the City replied to Ms. Gulley's letter via regular mail. The City's response letter to Ms. Gulley included information regarding the amount of ground disturbance proposed for the Project Site and indicated that archaeological reports would be provided separately after staff had concluded its review of the City's public records. The City's letter also requested that the Tribe provide any information or evidence that supports the Project's potential to impact tribal cultural resources within the Project Site. In July 2016, Ms. Gulley provided an e-



mail to the City stating the Tataviam no longer wish to consult on the Project. No other response letters from the Native American community were received by the City as part of the AB 52 tribal consultation effort. As a result, the City concluded tribal consultation efforts.

Prior to the City's AB 52 consultation efforts, however, and as part of the Archaeological and Paleontological Resources Assessment, the results of the records searches through the SCCIC and NAHC disclosed that no known prehistoric archaeological resources have been recorded within the Project Site or within a half-mile radius of the Project Site. Pursuant to NAHC's suggested procedure, follow-up letters were sent by ESA's predecessor, PCR, via certified mail and via email on August 19, 2015 to the Native American individuals and organizations identified by the NAHC as being affiliated with the vicinity of the Project Site to request any additional information or concerns they may have about Native American cultural resources that may be affected by the Project. On August 20, 2015, Mr. John Tommy Rosas from the Tongva Ancestral Territorial Tribal Nation replied via email. Mr. Rosas requested specific Project information including excavation depths/plans and lead agency contact information for further consultation regarding the Project. On September 8, 2015, PCR replied via email and provided Mr. Rosas with excavation depths and the lead agency contact. Mr. Rosas' e-mailed response is included as an appendix to the Record Search Report and Tribal Consultation Summary in Appendix M.

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

In assessing the Project's potential impacts related to tribal cultural resources in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The L.A. CEQA Thresholds Guide (Thresholds Guide) does not include factors to evaluate a project's impacts to tribal cultural resources.

## **b) Methodology**

In order to analyze the Project's potential impacts to tribal cultural resources, the City conducted tribal consultation in accordance with AB 52, as discussed above. The City sent notification and request to consult letters to nine (9) Native American individuals and organizations on the City's AB 52 Notification List on March 30, 2016 and conducted follow-up Native American consultation with the particular tribe who requested consultation. In addition, prior to the City's AB 52 consultation efforts, as part of the Archaeological and Paleontological Resources Assessment, a SLF records search was conducted through the SCCIC and NAHC and follow-up communications occurred with Native American groups and/or individuals identified by NAHC as having affiliation with the Project Site vicinity, as described above. The results of the City's AB 52 consultation efforts and those conducted as part of the Archaeological and Paleontological Resources Assessment were considered in the analysis below.

## **c) Project Design Features**

There are no Project Design Features that relate to tribal cultural resources.

## **d) Analysis of 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); 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

In accordance with AB 52, the City submitted request to consult letters to nine Native American individuals and organizations on the City's AB 52 Notification List on March 30, 2016. The City received one response letter from the Fernandeno Tataviam Band of Mission Indians requesting formal consultation. However, in July 2016, the tribe withdrew their request for consultation without providing any evidence of tribal cultural resources on the Project Site. To date, the City has not received any information from the tribe regarding any known tribal cultural resources within the Project Site or its vicinity. In addition, no other response letters from the Native American community have been received as part of the AB 52 tribal consultation effort. As a result, the City concluded its AB 52 tribal consultation efforts.

In addition, separate from the City's AB 52 consultation process, results of the records searches as part of the Archaeological and Paleontological Resources Assessment through the SCCIC and NAHC revealed that no known historic or prehistoric archaeological resources which could be considered a tribal cultural resource have been recorded within the Project Site or within a half-mile radius of the Project Site. Furthermore, the communications with John Tommy Rosas from the Tongva Ancestral Territorial Tribal Nation described above did not provide any evidence regarding tribal cultural resources on the Project Site or in the nearby vicinity.

As a result of the City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment, no known tribal cultural resources have been identified within the Project Site or in the surrounding area. Accordingly, Project implementation would result in no impacts to known tribal cultural resources. However, excavations associated with the Project could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. In the unlikely event that buried tribal cultural resources are inadvertently encountered during construction, 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. These standard City conditions require the immediate halt of construction activities in the vicinity of the discovery, the coordination with appropriate Native American tribes and the City, and the development and implementation of appropriate measures for treating the discovery.

**As a result, adherence to the City's standard Conditions of Approval will ensure that the Project would have no impacts, or at most less than significant impacts, to unknown tribal cultural resources.**

### **e) Cumulative Impacts**

As stated above, no known tribal cultural resources have been identified within the Project Site or its vicinity; therefore, the Project would not contribute to a cumulative impact on known tribal cultural resources. Each related project would also be required, in association with CEQA review, to engage in AB 52 consultations with Native American tribes in order to identify tribal cultural resources that could potentially be impacted by the related project, and to mitigate any identified potential impact. Because no known tribal cultural resources are located within the Project Site and given the low potential to encounter unknown resources, the Project's contribution to a cumulative impact, if any, would not be cumulatively considerable, and the Project's cumulative impacts would be less than significant.

### **f) Mitigation Measures**

The Project would not cause an impact to known tribal cultural resources; therefore, no mitigation measures are required. In the unlikely event that buried tribal cultural resources are encountered inadvertently during construction, 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.

### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts related to tribal cultural resources would be less than significant without mitigation.

## **IV. Environmental Impact Analysis**

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### **N.1 Utilities and Service Systems – Water, Wastewater and Solid Waste**

#### **1. Introduction**

This section of the Draft EIR analyzes the Project's demand on utility services and the capacity of infrastructure to meet that demand. The analysis of water demand relies on the *Water System and Supply Report for the 6220 West Yucca* (herein referred to as the "Water System and Supply Report"), prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. The Water System and Supply Report is provided in Appendix N, of this Draft EIR.

The analysis of wastewater demand and infrastructure relies on the *6220 W. Yucca Street Mixed Development – Wastewater (Revision)* (herein, referred to as the "Wastewater Technical Study"), prepared by Southland Civil Engineering & Survey, LLP, dated November 2, 2017 and the *6220 Yucca Street – Request for Wastewater Services Information* (herein, referred to as the "Request for WWSI"), prepared by the City of Los Angeles, LA Sanitation (LASAN), Wastewater Engineering Services Division, dated July 7, 2017, which are provided in Appendix N of this Draft EIR

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) Federal**

###### **(a) *Resource Conservation and Recovery Act***

The Resource Conservation and Recovery Act (RCRA) governs the disposal of solid and hazardous waste. RCRA sets national goals for reducing the amount of waste generated and for ensuring that wastes are managed in an environmentally sound manner. RCRA encourages states to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste, sets criteria for municipal solid waste landfills, and prohibits the open dumping of solid waste. RCRA regulations encourage source reduction and recycling and promote the safe disposal of municipal waste.

## (2) State of California

### (a) *Water Regulations*

#### (i) *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 in urban areas to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires certain urban water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demand during normal, dry, and multiple-dry years over a 20-year time horizon. Specifically, urban water suppliers that serve more than 3,000 customers or provide more than 3,000 acre feet per year (AFY) of water must adopt an UWMP.

#### (ii) *Senate Bill 610, Senate Bill 221, and Senate Bill X7-7*

State legislation addressing water supply, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in CWC §10910 et seq., creates and describes requirements for preparing water supply assessments (WSAs) and describes the role UWMPs play in creating WSAs. SB 610 requires certain large-scale projects that are subject to CEQA, which meet specific criteria below, to have a WSA prepared by the project's water supplier to be included in an applicable project's CEQA analysis. The WSA must determine whether the water supplier has sufficient water supplies to meet the projected water demand associated with a project based on the analysis of the supplier's water supply in its most recent UWMP. In addition, where applicable, a WSA must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area if relevant to the project at issue. 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.

SB 610 requires WSA's to be prepared for projects meeting 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 system 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.

With the passage of SB7-7 on November 10, 2009, new water conservation goals were established 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.<sup>1</sup> As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate.

SB 221 complements SB 610 by providing a second check on water supplies for large subdivision projects at the end of the planning process at the time a final subdivision map is approved. SB 221 requires that a written Water Supply Verification (WSV) from the water service provider be submitted stating whether a sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to the completion of the project. SB 221 specifically applies to residential subdivisions of 500 units or more. In addition, 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.”

The Project is not subject to the requirements of SB 610, as it neither includes the development of 500 residential units or retail floor area in excess of 500,000 square feet, nor would it generate a water demand equivalent to or greater than that required by a 500 dwelling unit project. In addition, the Project is not subject to the requirements of SB 221 because it does not propose the development of 500 or more dwelling units and because it is an urban infill project that is exempt from SB 221 under Government Code Section 66473.7(i). Therefore, neither a WSA nor a WSV is required to be prepared by LADWP, the Project’s proposed water service provider. As discussed in the analysis below, LADWP’s 2015 UWMP, which addresses priorities and water supply and demand

<sup>1</sup> California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010. Available at: [https://www.waterboards.ca.gov/water\\_issues/hot\\_topics/20x2020/docs/20x2020plan.pdf](https://www.waterboards.ca.gov/water_issues/hot_topics/20x2020/docs/20x2020plan.pdf). Accessed August 2019.

forecasts through 2040, indicates that LADWP has adequate water supplies to serve the Project.

(iii) *Article 22.5 Drought Emergency Water Conservation, California Code of Regulations (Emergency Declaration and Executive Orders B-29-15, B-36-15 and B-37-16)*

Governor Edmund G. Brown Jr. prepared a series of executive orders to address recent draught conditions in the state. The first executive order, issued on January 17, 2014 proclaimed State of Emergency and directed State officials to take all necessary actions to make water immediately available. The proclamation included numerous measures such as asking Californians to reduce water consumption by 20 percent, directing local water suppliers to implement water shortage contingency plans, and other measures to be implemented by state agencies.

Seven subsequent proclamations have built upon and provided further guidance regarding the original order. Notably, Executive Order B-29-15, April 1, 2015, ordered the SWRCB to impose restrictions to achieve a 25 percent reduction in potable urban water usage through February 28, 2016; and directed the California DWR to lead a statewide initiative, in partnership with local agencies, to collectively replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes. The most recent proclamation, Executive Order B-37-16 on May 9, 2016, directs the SWRCB and DWR to set new water reduction targets, building upon Senate Bill No. 7. Among other provisions, it also provides guidance for new water use prohibitions and updated requirements for Water Shortage Contingency Plans.

On February 8, 2017, the SWRCB extended water conservation regulations, continuing the prohibition of wasteful practices and conservation mandates. While heavy rains in the 2016 – 2017 rain season had reduced drought conditions in some portions of the state, the Board concluded: (1) drought continues to exist in portions of the state, and snowpack and reservoir conditions for the end of the water year remain subject to significant change; (2) the drought conditions may persist or continue locally through the end of the water year; and (3) additional action by both the SWRCB and local water suppliers will likely be necessary to prevent waste and unreasonable use of water and to further promote conservation. On April 7, 2017 the Governor declared an end to California's drought emergency in Executive Order B-40-17 for most of the California counties, inclusive of Los Angeles County. The end of the drought emergency was a result of increased rainfall in the last year and large storms during the winter of 2016 to 2017. While ending the drought declaration, the executive order notes that "...the next drought could be around the corner," and "Conservation must remain a way of life." Accordingly, conservation actions taken in Executive Order B-37-16 remain in effect.



*(iv) Sustainable Groundwater Management Act of 2014<sup>2</sup>*

The Sustainable Groundwater Management Act of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. The Sustainable Groundwater Management Act requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally-based management plans in non-adjudicated groundwater basins where moderate to severe overdraft conditions exist, which are described as medium and high priority basins. Overdraft conditions describe a circumstance where groundwater pumping levels exceed recharge levels, and therefore in time, if nothing changes, the basin would become depleted. The level of priority for California's groundwater basins has been determined by Department of Water Resources (DWR) in Bulletin 118, DWR's long-time list and survey of California Groundwater Basins, which information has been supplemented by a groundwater monitoring program under State law SBx76. Local groundwater sustainability agencies under the Sustainable Groundwater Management Act must be formed by June 30, 2017. Groundwater sustainability agencies responsible for high-and medium-priority basins must adopt groundwater sustainability plans within five to seven years, depending on the severity of conditions of overdraft. The Sustainable Groundwater Management Act provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability. The Sustainable Groundwater Management Act provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. The Sustainable Groundwater Management Act expressly exempts from its requirements groundwater basins already subject to adjudication and management under court-appointed watermasters. Because the City's groundwater pumping occurs exclusively in adjudicated groundwater basins under the ongoing management of a court-appointed watermaster committee, the Sustainable Groundwater Management Act does not directly impact LADWP groundwater supplies.

*(v) California Water Plan*

Required by the Water Code 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. The plan 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 plan, updated every five years, presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental

<sup>2</sup> Association of California Water Agencies, Sustainable Groundwater Management Act of 2014 Frequently Asked Questions, October 2014. Available at: [https://www.bvh2o.com/SGMA/2014%20Groundwater%20FAQ%20\(2\).pdf](https://www.bvh2o.com/SGMA/2014%20Groundwater%20FAQ%20(2).pdf). Accessed September 2019.

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. California Water Plan Update 2013 represents the latest update to the Water Plan and a 2018 update is underway. The California Water Plan is discussed further below under climate change.

(vi) *California Code of Regulations Title 20*

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR) establishes 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 rates 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 water closets is 1.8 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.

(vii) *California Code of Regulations Title 24, Part 11*

California Green Building Standards Code, commonly referred to as the CALGreen Code set forth in Part 11 of Title 24, regulates the design and construction of buildings. The 2016 CALGreen Code also has new and 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. Local jurisdictions also retain the administrative authority to exceed the CALGreen standards. The 2013 CALGreen Code went into effect Statewide on July 1, 2014. The purpose of CALGreen 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. CalGreen includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. 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. The voluntary measures can be adopted by local jurisdictions for greater efficiency. As described further below, the City of Los Angeles has updated the Los Angeles Green Building Code in compliance with the 2013 CALGreenCode, with the 2013 requirements applicable to project applications filed on or after January 1, 2014.

(viii) *California Code of Regulations Title 24, Part 5*

Title 24, Part 5 of the California Code of Regulations, establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2016 California Plumbing Code, which is based on the 2015 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2017.

(b) *Solid Waste Regulations*

(i) *Assembly Bill 939 - California Integrated Waste Management Act of 1989*

The State Legislature passed the California Integrated Waste Management Act of 1989 (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 mandated that jurisdictions meet a diversion goal (diverting waste from landfills) of 50 percent by 2000 and thereafter.

AB 939 requires that all counties and cities develop a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (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. It also requires counties to develop a Siting Element that addresses the need for landfill/transformation facilities for 15-year intervals; and it also mandates, all cities and counties to prepare and submit Annual Reports that summarize the jurisdictions' progress in reducing solid waste. Oversight of these activities was set up under the aegis of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to CalRecycle as of January 1, 2010.

(ii) *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 by March 1, 1993, a model ordinance for adoption of recyclable materials in development projects. 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 model ordinance adopted by the CalRecycle would take effect and would be enforced by the local agency. As noted below, the City passed such an ordinance in 1997.

(iii) *Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements*

Senate Bill 1374 was adopted into law in 2002 and requires the range of diversion rates of construction and demolition (C&D) waste material from 50 to 75 percent at the local level. The bill called for preparation of a model C&D diversion ordinance by March 1, 2004, and a model ordinance was adopted by CalRecycle on March 16, 2004. The bill also required that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting C&D wastes.

(iv) *Assembly Bill 341 – California’s 75% Initiative*

Assembly Bill (AB) 341, which took effect on July 1, 2012, was designed to help meet California’s recycling goal of 75 percent by the year 2020. AB 341 makes “...a legislative declaration that it is the policy goal of the State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020...” AB 431 requires a business, defined to include a commercial or public entity that generates more than four cubic yards of commercial solid waste per week or a multifamily residential dwelling of five units or more, to arrange for recycling services. 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.

(v) *Assembly Bill 1826 – Commercial Organic Waste Recycling Law*

AB 1826, which became effective on January 1, 2016, requires businesses that generate a specified amount of organic waste per week to arrange for recycling services for that waste, and for jurisdictions to implement a recycling program to divert organic waste from businesses subject to the law, as well as report to CalRecycle on their progress in implementing an organic waste recycling program. Beginning January 1, 2019, generators of four or more cubic yards of commercial solid waste per week are required to arrange for organic waste recycling services. After receipt of the 2019 annual reports submitted on August 1, 2020, CalRecycle shall conduct a formal review of all jurisdictions. If CalRecycle determines that the statewide disposal of organic waste in 2020 has not been reduced by 50 percent of the level of disposal during 2014, the organic recycling requirements on businesses will expand to cover businesses that generate two cubic yards or more of commercial solid waste per week in 2021.

(vi) *Zero Waste California*

Zero Waste California is a State program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste by maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the

potential to be repaired, reused, or recycled.<sup>3</sup> The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

### (3) Regional

#### (a) *Water Regulations*

##### (i) *Metropolitan Water District of Southern California*

The Metropolitan Water District of Southern California (MWD) is a regional wholesale water service provider for the region in which the Project Site is located. MWD provides water to 26 member public agencies, which includes LADWP. To supply the more than 300 cities and unincorporated areas in Southern California with reliable and safe water, MWD owns and operates an extensive water system including: the Colorado River Aqueduct (CRA), 16 hydroelectric facilities, 9 reservoirs, 810 miles of large-scale pipes and five water treatment plants.<sup>4</sup>

MWD is the largest contractor off the State Water Project, holding a contract for 2.01 million acre feet (AF) of the project's 4.23 million AF capacity. The full capacity of State Water Project is not always available, however, and MWD's supply of water from the State Water Project has historically been affected by variable hydrology and environmental issues in the San Francisco Bay/Sacramento-San Joaquin River Delta (Bay-Delta). As a result, the amount of water allocated by the DWR can be altered from month to month. For example, as of May 2018, DWR had allocated to MWD only 35 percent of the supplies MWD has requested.<sup>5</sup> Due to the need to ensure the reliability of its water supplies, MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a long-term water supply for its member agencies.

##### (ii) *Metropolitan Water District's 2015 Urban Water Management Plan*

The MWD's 2015 UWMP addresses the future of MWD's water supplies and demand through the year 2040.<sup>6</sup> Based on the 2015 UWMP, MWD has supply capabilities that will be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions. MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and

<sup>3</sup> CalRecycle Website, Zero Waste, <https://www.calrecycle.ca.gov/zerowaste>, accessed August 2019.

<sup>4</sup> The Metropolitan Water District of Southern California Website, <http://www.mwdh2o.com/WhoWeAre/Mission/Pages/default.aspx>, accessed August 2019.

<sup>5</sup> See May 18, 2018 State Water Project Allocation Increase at <https://water.ca.gov/Programs/State-Water-Project/Management/SWP-Water-Contractors>, accessed August 2019.

<sup>6</sup> Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016. Available at: [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2.4.2\\_Regional\\_Urban\\_Water\\_Management\\_Plan.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf). Accessed September 2019.

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 SWP deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the CRA, 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 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the 20 percent per person potable water use reduction by 2020.

(iii) *MWD's 2015 Integrated Water Resources Plan*

The MWD also prepares an Integrated Water Resources Plan (IRP). The IRP provides a water management framework that includes plans and programs for meeting future water needs. The IRP addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. MWD first adopted its IRP in 1996. The most recent IRP (2015 IRP) was adopted in January 2016. 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:<sup>7</sup>

- Stabilizing and maintaining imported supplies;
- Meeting future growth through increased 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 CRA deliveries in dry years. MWD would

<sup>7</sup> *Integrated Water Resources Plan, 2015 Update*, Report No. 1518, dated January 2016, Summary, page 6.5, [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2015%20IRP%20Update%20Report%20\(web\).pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2015%20IRP%20Update%20Report%20(web).pdf), accessed August 2019.

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 from outdoor landscapes and advancing additional local supplies are among the planned actions to 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.<sup>8</sup>

(iv) *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 (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM 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 WSDM 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.

(v) *MWD's Water Supply Allocation Plan*

While the Water Surplus and Drought Management Plan includes a set of general actions and considerations for MWD staff to address during shortage conditions, it does 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

<sup>8</sup> Integrated Water Resources Plan, 2015 Update, Report No. 1518, dated January 2016, Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), Executive Summary page VIII.

aspects of nonpotable 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.

(b) *Solid Waste Regulations*

(i) *County of Los Angeles Integrated Waste Management Plan (CoLWMP)*

Pursuant to AB 939 each county is required to prepare and administer a Countywide Integrated Waste Management Plan, including preparation of an Annual Report. The County of Los Angeles Integrated Waste Management Plan (CoLWMP) is comprised of the County of Los Angeles' (County) and each 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 Los Angeles County Department of Public Works (Public Works) is responsible for preparing and administering the Summary Plan and the CSE. The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoLWMP 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.

In addition, as part of its regulatory efforts, the County has prepared a long-term master plan which describes how the County will manage solid waste through the year 2050. The 2050 Plan identifies measures to meet the landfill needs over the time horizon and includes such measures as conserving in-County disposal capacity, implementing waste diversion programs, fostering alternatives to landfills, and identifying funding resources to carry out the plan.

(4) Local

(a) *Water Regulations*

(i) *LADWP's 2015 Urban Water Management Plan (UWMP)*

Established in 1925 by the City Charter, the LADWP water supplier in the City of Los Angeles and, as such, is required to prepare an UWMP every five years. The LADWP's 2015 UWMP serves two purposes: (1) achieve full compliance with requirements of California's Urban Water Management Planning Act; and (2) serve as a master plan for water supply and resources management consistent with the City's goals and policy objectives.



A number of significant changes have occurred since LADWP prepared its 2010 UWMP. The year 2012 marked the beginning of the current multi-year drought in California. As discussed above, in January 2014, Governor Brown proclaimed a drought state of emergency. In July 2014, the SWRCB implemented its Emergency Water Conservation Regulation (Emergency Regulation), as directed by Governor Brown, to take actions to reduce water use by 20 percent Statewide. Later, this reduction figure was increased to 25 percent Statewide, with adjustments to account for different climates, expected growth, investment made to create drought-resilient water supplies by different cities through October 2016. In October 2014, Mayor Eric Garcetti issued Executive Directive No. 5 (ED5) Emergency Drought Response, which set goals to reduce per capita water use, reduce purchases of imported potable water by 50 percent, and create an integrated water strategy to increase local supplies and improve water security considering climate change and seismic vulnerability. Lastly, in April 2015, the Mayor's Sustainable City pLAN, discussed below, was released establishing targets for the City over the next 20 years to strengthen and promote sustainability. The 2015 UWMP incorporates the objectives of these recent initiatives. Overall, the 2015 UWMP projects a seven-percent lower water demand trend than what was projected in the previous 2010 UWMP.

(ii) *Sustainable City pLAN*

In April 2015, the City's first Sustainable City pLAN was released (the pLAN). The pLAN includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reduce water use through conservation, and increase local water supply and availability. The pLAN enhances ED5 goals and incorporates water savings goals of reduction in per capita potable water by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035. The pLAN also includes a reduction in imported water purchases from MWD by 50 percent of the total supply by 2035. Specific strategies and desired outcomes for conservation, recycled water, and stormwater capture are included in the pLAN. These include investments in State-of-the art technology, rebates and incentives promoting water-efficient appliances, tiered water pricing, a technical assistance program for business and industry, and large landscaped irrigation and efficiency programs.

(iii) *Hollywood Community Plan*

The 1988 Hollywood Community Plan provides general guidance for “service systems.” However, it provides no specific policies pertaining to the provision of water, sewer service, or solid waste. The 1988 Hollywood Community Plan states that “service systems” 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.” While the 1988 Hollywood Community Plan focuses on “public facilities” such as schools and parks, they also include utilities such as power lines.

*(iv) One Water LA 2040 Plan*

The City is currently preparing the One Water LA 2040 Plan, an integrated approach to water supply, wastewater treatment, and stormwater management. 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 systems, recycled water systems, and runoff management programs in the City through the year 2020. The One Water LA 2040 Plan proposes to set a new bar for a more sustainable way to manage the City's future water, wastewater treatment, and stormwater management needs through a collaborative approach with the overarching goal of yielding sustainable, long-term water supplies for Los Angeles in addition to greater resiliency to drought conditions and climate change. Moreover, the One Water LA Plan is being planned as an essential step in meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.<sup>9</sup> Preparation of the One Water LA Plan is occurring in two phases and being managed by City of Los Angeles, LASAN in partnership with Los Angeles Department of Water and Power (LADWP).<sup>10</sup>

*(v) City of Los Angeles Ordinances*

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, encouragement of sustainable development and initiatives to address potential water shortages due to changing supply availability. The ordinances are discussed below.

**Ordinance No. 180,822.** The Water Efficiency Requirements Ordinance, City Ordinance No. 180,822, effective Dec. 1, 2009, establishes water efficiency requirements for new development and renovation of existing buildings, mandating installation of high efficiency plumbing fixtures in residential and commercial buildings. These standards are more stringent than the standards described above for the State regulations. For example, the maximum toilet flow is 1.28 gallons per flush in contrast to the State standard of 1.8 gallons per flush, and the faucet standard is 2.2 gallons per minute in contrast to the State's 2.5 gallons per minute.

**Ordinance No. 181,480.** The City's Green Building Code, Ordinance No. 181,480, creates a set of development standards and guidelines to further energy efficiency and reduction of greenhouse gases. The Ordinance builds upon and sets higher standards than those incorporated in the CALGreen described above. Amongst its provisions are efficiency standards regarding water fixtures and appliances in new buildings. The Green

<sup>9</sup> City of Los Angeles, Eric Garcetti, Mayor, Executive Directive No. 5, Subject: Emergency Drought Response – Creating a Water Wise City, Issue Date: October 14, 2014, [https://d3n8a8pro7vhmx.cloudfront.net/mayorofla/pages/17070/attachments/original/1426620015/ED\\_5\\_-\\_Emergency\\_Drought\\_Response\\_-\\_Creating\\_a\\_Water\\_Wise\\_City.pdf?1426620015](https://d3n8a8pro7vhmx.cloudfront.net/mayorofla/pages/17070/attachments/original/1426620015/ED_5_-_Emergency_Drought_Response_-_Creating_a_Water_Wise_City.pdf?1426620015), accessed August 2019.

<sup>10</sup> City of Los Angeles Website, One Water LA, Plan Documents, [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-es-owla-r?\\_adf.ctrl-state=1atg8sbqul\\_5&\\_afLoop=2823856924120763#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-r?_adf.ctrl-state=1atg8sbqul_5&_afLoop=2823856924120763#!), accessed August 2019.

Building Code is implemented through the building permit review process, during which projects are evaluated for compliance with the required water conservation features.

**Ordinance No. 170,978.** In 1996, Ordinance No. 170,978 amended Los Angeles Municipal Code Sections 12.40 through 12.43 to establish consistent landscape requirements for new projects within the City. This ordinance requires 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.

**Ordinance No. 181,899; and Ordinance No. 183,833.** In 2011, the City adopted Ordinance No. 181,899, the Citywide Low Impact Development (LID) Ordinance (LID Ordinance). 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. Among other provisions regarding drainage, the LID promotes the collection and use of on-site stormwater for irrigation of landscaping and recharge to the groundwater table where/if appropriate. Ordinance No. 183,833, establishes City requirements to meet its obligations under its Municipal Separate Storm Sewer (MS4) Permit. The ordinance further delineates implementation procedures for meeting the City’s LID requirements.

**Ordinance No. 183,608.** The City’s Emergency Water Conservation Plan was most recently updated on June 9, 2015, superseding Ordinance No. 181,288. The purpose of this Ordinance is to 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. The Ordinance establishes varied water consumption limitations arranged by Phases, whereby the level of restriction for each Phase is tied to the level of water conservation required. Water conservation measures include such restrictions as limited watering of hard surfaces, and automobiles, and rationed watering of landscaping. The most recent update to the Ordinance added an additional phase to allow for outdoor watering two days a week, and to clarify other prohibited uses for other phases.

In addition to the above ordinances, as discussed in Section IV.K.1, *Fire Protection and Emergency Medical Services*, of this Draft EIR, Los Angeles Fire Code Section 57.507.3.1, Fire-Flow Requirements, establishes minimum fire flow requirements in gallons per minute (gpm) according to designated land use. Existing fire service pressure flows available for a site are determined via project applicants submitting a Service Advisory Request (SAR) to LADWP.

(vi) *One Water LA 2040 Plan*

The City is currently preparing the One Water LA 2040 Plan, an integrated approach to water supply, wastewater treatment, and stormwater management. 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 systems, recycled water systems, and runoff management programs in the City through the year 2020. The One Water LA 2040 Plan proposes to set a new bar for a more sustainable way to manage the City's future water, wastewater treatment, and stormwater management needs through a collaborative approach with the overarching goal of yielding sustainable, long-term water supplies for Los Angeles in addition to greater resiliency to drought conditions and climate change. Moreover, the One Water LA Plan is being planned as an essential step in meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.<sup>11</sup> Preparation of the One Water LA Plan is occurring in two phases and being managed by City of Los Angeles, LASAN in partnership with Los Angeles Department of Water and Power (LADWP).<sup>12</sup>

(b) *Wastewater Regulations*

(i) *City of Los Angeles General Plan Framework Element*

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including water supply, wastewater collection and treatment, and solid waste. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.<sup>13</sup> Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.<sup>14</sup> Goal 9D calls for "An integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."<sup>15</sup>

(ii) *Los Angeles Municipal Code*

The LAMC includes provisions that enable the City to ensure 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 a project: (1) is required to seek a sewer permit to connect a property to the City's sewer collection system, (2) proposes additional discharge through their existing public sewer connection, or (3) proposes a future sewer connection or future development that is

<sup>11</sup> City of Los Angeles, Eric Garcetti, Mayor, Executive Directive No. 5, Subject: Emergency Drought Response – Creating a Water Wise City, Issue Date: October 14, 2014, [https://d3n8a8pro7vhmx.cloudfront.net/mayorofla/pages/17070/attachments/original/1426620015/ED\\_5\\_-\\_Emergency\\_Drought\\_Response\\_-\\_Creating\\_a\\_Water\\_Wise\\_City.pdf?1426620015](https://d3n8a8pro7vhmx.cloudfront.net/mayorofla/pages/17070/attachments/original/1426620015/ED_5_-_Emergency_Drought_Response_-_Creating_a_Water_Wise_City.pdf?1426620015), accessed August 2019.

<sup>12</sup> City of Los Angeles Website, One Water LA, Plan Documents, [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-es-owla-r?\\_adf.ctrl-state=1atg8sbqul\\_5&\\_afLoop=2823856924120763#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-r?_adf.ctrl-state=1atg8sbqul_5&_afLoop=2823856924120763#!), accessed August 2019.

<sup>13</sup> City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Wastewater; Re-Adopted by Los Angeles City Council on August 8, 2001. Available at: <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>. Accessed September 2019.

<sup>14</sup> Op. Cit., Water Supply.

<sup>15</sup> Op. Cit., Solid Waste

In addition, 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 Special Order No. SO06-0691). Per the Special Order, lateral sewers, defined as 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 wastewater flow depth (d) during their planning period shall not exceed one-half the pipe diameter (D), i.e. depth to diameter ratio of  $d/D$ .<sup>16</sup>

The State of California requires all publicly owned sanitary sewer systems to have a written Sewer System Management Plan (SSMP).<sup>17</sup> The City has prepared one SSMP for each of the three sanitary sewer systems it operates: Hyperion Water Reclamation Plant Sanitary Sewer System, in which the Project is located;<sup>18</sup> Terminal Island Water Reclamation Plant Sanitary Sewer System; and City of Los Angeles Regional Sanitary

18 City of Los Angeles, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2015. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M216.pdf>. Accessed September 2019.

Sewer System.<sup>19</sup> 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. They also provide procedures for evaluating the system and providing capacity assurance, and establishes a standard of 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 February 2017 following a biennial internal audit pursuant to the State requirements.

*(b) City of Los Angeles Integrated Resources Plan*

The City of Los Angeles Integrated Resources Plan (IRP), which replaced the City's 1991 Wastewater Facilities Plan, is an integrated plan to address the facility needs of the City's wastewater program, recycled water, and urban/stormwater management through 2020.<sup>20</sup> The IRP preparation process began in 1999 and consisted of two phases. Phase I addressed the anticipated water, wastewater and stormwater needs of the City through 2020 using comprehensive, basin-wide water resources planning. Phase II, which took place from 2002 to 2006, aimed at ensuring implementation of the appropriate infrastructure, policies, and programs to reliably serve Los Angeles to 2020 and beyond. The Los Angeles City Council certified the IRP Final Environmental Impact Report (EIR) on November 14, 2006. As part of the approved IRP, 12 capital improvement projects were identified to improve the City's wastewater infrastructure and treatment systems. The 12 projects were separated into two categories: (1) "Go Project" for immediate implementation; and (2) "Go-If Triggered Projects." Triggers for these latter projects include wastewater flow, population, regulations, and operational efficiency.

Since implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. The City is continually reviewing the need for any of the capital improvement projects through a series of five-year reviews. Reviews are conducted every five years in order to revisit and review recommendations set forth in the IRP. However, as 2020 approaches, the City is developing its One Water LA 2040 Plan, discussed below, which will result in the City re-evaluating the need for the IRP capital improvement projects yet to be triggered.

<sup>19</sup> City of Los Angeles Sanitation. City of Los Angeles Sewer System Management Plan Website. Available at: <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf>, accessed September 2019.

<sup>20</sup> City of Los Angeles Website, One Water LA, 2006 Water IRP Facilities Plan, Available at: [https://planning.lacity.org/eir/8150Sunset/References/4.K.2.%20Wastewater/WW.04\\_IRP\\_September%202006.pdf](https://planning.lacity.org/eir/8150Sunset/References/4.K.2.%20Wastewater/WW.04_IRP_September%202006.pdf). Accessed August 2019.

(c) *Solid Waste Regulations*

(i) *City of Los Angeles Solid Waste Management Policy Plan*

The City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. 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.<sup>21</sup> 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 Source Reduction and Recycling Element (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 following five goals of the CiSWMPP reflect the importance of source and materials recovery and, thus, the intent of the City to follow State regulations:

- **Maximum Waste Diversion:** The goal is to create an integrated solid waste management system that maximizes source reduction and materials recovery and that minimizes waste requiring disposal.
- **Adequate Recycling Facility Development:** The goal is to expand the siting of facilities that enhance waste reduction, recycling, and composting throughout the City and beyond the current limits of the zoning code in ways that are economically, socially, and politically acceptable.
- **Adequate Collection, Transfer, and Disposal of Mixed Solid Waste:** The City shall ensure that all mixed solid waste that cannot be reduced, recycled, or composted be collected, transferred, and disposed of in a manner that minimizes environmental impacts.
- **The goal is to develop an environmentally sound solid waste management system that protects public health and safety, protects natural resources, and utilizes the best available technology to accommodate the needs of the City.**
- **The City shall operate a cost-effective integrated waste management system that emphasizes source reduction, recycling, reuse, and market development and that is adequately financed to meet operational and maintenance needs.**

<sup>21</sup> City of Los Angeles, Department of Public Works, Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, January, 2006. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M307.pdf>. Accessed September 2019.

(ii) *Recovering Energy, Natural Resources and Economic Benefit from Waste for L.A. (RENEW LA)*

The City adopted the RENEW LA Plan in 2006 to move beyond the concept of "waste management" to a new paradigm of maximum resource recovery.<sup>22</sup> The purpose of the plan 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 the RENEW LA Plan is to reach zero waste through reducing, reusing, recycling, or converting the resources now going into landfills. The Plan called for obtaining a minimum of 90 percent diversion by 2025 and provides direction to City departments on procedures to attain the objective.

(iii) *Solid Waste Integrated Resources Plan (SWIRP)*

The City of Los Angeles, Bureau of Sanitation has established the SWIRP planning process to build on the direction provided by RENEW LA, as well as directives of the Mayor and City Council to achieve 90 percent diversion by 2025. The SWIRP provides a long term master plan through 2030 for the City's solid waste and recycling programs.<sup>23</sup>

The SWIRP contains the City's objectives to provide sustainability, resource conservation, source reduction, recycling, renewable energy, maximum material recovery, public health and environmental protection for solid waste management planning through 2030. The goals of the SWIRP are to eliminate the City's use of urban landfills, develop alternative technologies for long-term waste disposal, increase recycling and resource recovery and to convert the entire Sanitation fleet to clean fuel Liquid Natural Gas vehicles with the ultimate goal of leading Los Angeles toward being a zero waste City by 2030. The term "zero waste" refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycle/reused materials. As noted by the City, "zero waste" is a goal and not a categorical imperative; the City is seeking to come as close to "zero waste" as possible.

<sup>22</sup> Fact Sheet: The City's Solid Waste Policies and Programs, <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M317.pdf>, accessed August 2019.

<sup>23</sup> City of Los Angeles, Solid Waste Integrated Resources Plan (SWIRP), [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?\\_afLoop=3441858566035886&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=lm4ym20i3\\_212#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D3441858566035886%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dlm4ym20i3\\_216](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afLoop=3441858566035886&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=lm4ym20i3_212#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3441858566035886%26_afWindowMode%3D0%26_adf.ctrl-state%3Dlm4ym20i3_216), accessed August 2019.



(iv) *City of Los Angeles Space Allocation Ordinance – SB 1327*

Pursuant to SB 1327, the City enacted the Space Allocation Ordinance (Ordinance No. 171,687) on August 13, 1997. The Ordinance establishes requirements for the inclusion of recycling areas or rooms within development projects.<sup>24</sup>

(v) *Construction and Demolition Waste Recycling Ordinance and Waste Hauler Permit (AB 939 Compliance Permit)*

LA Sanitation's Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and reuse programs in the City through the implementation of the Construction and Demolition Recycling Guide, adopted in August 2007.<sup>25</sup> The Solid Resources Citywide Recycling Division provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste (HHW), and helps create markets for recycled materials. In order to help meet the diversion goals of AB 939 and the City, the City adopted the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling construction and demolition waste obtain a Private Solid Waste Hauler Permit from LA Sanitation prior to collecting, hauling and transporting construction and demolition waste. It requires that all construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors, where the waste would be recycled to the extent feasible.

(vi) *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 blue recycling containers and 90-gallon green yard waste containers, the City currently collects an average of 800 tons per day of recyclable materials and 1,700 tons per day of green waste from City residents. Participating residents include 530,000 single-family homes and 220,000 small multi-family units. Today, when combining with the multi-family and other City recycling programs, the diversion rate is 76.4 percent.<sup>26</sup>

<sup>24</sup> City of Los Angeles Space Allocation Ordinance, [http://clkrep.lacity.org/online/docs/1994/94-0056\\_ORD\\_171687\\_08-19-1997.pdf](http://clkrep.lacity.org/online/docs/1994/94-0056_ORD_171687_08-19-1997.pdf), accessed August 2019.

<sup>25</sup> Los Angeles Bureau of Sanitation, Construction and Demolition Recycling Guide, Revised August 9, 2007. Available at: <https://www.lacitysan.org/cs/groups/public/documents/document/mhfh/mdax/~edisp/qa001513.pdf>, accessed August 2019.

<sup>26</sup> LA Sanitation Website, Curbside Recycling Program, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?\\_adf.ctrl-state=1a5hv9g8mo\\_299&\\_afLoop=281868155642172#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_adf.ctrl-state=1a5hv9g8mo_299&_afLoop=281868155642172#!), accessed August 2019.

## b) Existing Conditions

### (1) Water

#### (a) *Potable Water Consumption*

The approximately 1.16-acre site is currently improved with one single-family residence, one duplex, one studio apartment over a detached garage, and three, two-story apartment buildings and associated carports and paved surface parking areas, all of which would be demolished and removed to allow for development of the Project. Overall, there are a total of 44 residential units currently on the Project Site (duplex = two units; one studio apartment over duplex garage, an apartment building containing 40 units and one-single-family residence). There are a total of 44 residential units currently on the Project Site. Landscaping on the site is limited to a small number of ornamental trees. LADWP currently provides water service from the existing water infrastructure system to the existing uses. The existing water demand generated by the residential uses is approximately 7,296 gallons per day (gpd) or approximately 8.17 AFY (see Table IV.N.1-8, below for a detailed breakdown).

#### (b) *Potable Water Infrastructure*

The existing water infrastructure serving the Project Site consists of water mains located in adjacent City streets. The local distribution network varies from four-inch to 12-inch pipe diameters and includes a 12-inch pipe beneath West Yucca Street; an eight-inch pipe beneath Argyle Avenue; and a four-inch pipe beneath Vista Del Mar Avenue.<sup>27</sup>

#### (c) *Potable Water Supply*

LADWP provides potable water Citywide and ensures that the water quality meets applicable California water quality standards for potable water. Primary sources of water for the LADWP service area are the Los Angeles Aqueducts (LAA), local groundwater, including stored groundwater, recycled water, water obtained via water transfers, and imported water purchased from the MWD, whose primary water sources are the SWP via the California Aqueduct and the Colorado River. **Table IV.N.1-1, LADWP Water Supply**, summarizes LADWP's water supplies from these sources over the past 10 years. As shown in Table IV.N.1-1, in 2016, LADWP had an available water supply of 488,677 AFY, approximately 18 percent of which was drawn from the LAA, approximately 15 percent of which was drawn from local groundwater, approximately 65 percent of which was drawn from the MWD, and approximately two percent of which was drawn from recycled water. Additionally, less than one percent was taken and stored into the reservoir system. Less than one percent was drawn from LADWP's reservoir system or provided via transfer. The available water supply is generally equivalent to the demand from year

<sup>27</sup> Water System and Supply Report for the 6220 West Yucca, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. (Appendix N to this Draft EIR)

to year, as LADWP purchases additional water from MWD only on an as-needed basis. These water sources are described in further detail below.

**TABLE IV.N.1-1  
LADWP WATER SUPPLY (AFY)**

Calendar Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
2006	380,235	67,299	188,585	3,893	-1,336	641,348
2007	127,392	88,041	439,353	3,595	-57	658,438
2008	148,407	64,604	427,422	7,048	1,664	645,817
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	556,872
2013	64,690	66,272	438,534	9,253	-2,404	581,153
2014	62,088	94,280	391,320	11,307	2,080	556,915
2015	26,828	81,618	378,439	9,844	432	496,297
2016	87,892	73,304	317,767	8,730	-984	488,677

SOURCE: LADWP Water Supply Assessment for the 668 S. Alameda Project, 2017.

*(d) 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. In recent years, LAA supplies that have been provided for use in the City have been lower than historic levels. Increasing loss of Sierra snowpack has occurred as a result of climate change. Decreases in water production from the LAA have also been due in part to LADWP's legal obligations to restore portions of Mono Lake and mitigate dust from Owens Lake through water-intensive mitigation measures. LADWP's ability to export Mono Basin water is now tied directly to the elevation of Mono Lake and flows of various streams that are tributary to Mono Lake, and continued obligations to use water to mitigate dust impacts at Owens Lake.

On November 14, 2014, a historic agreement between the City and the Great Basin Unified Air Pollution Control District (GBUAPCD) was announced, which defined the full extent of future liability for LADWP water-intensive dust impact mitigation at Owens Lake. The agreement allows LADWP to use more water-efficient and waterless dust mitigation measures while maintaining existing wildlife habitat on the lakebed. LADWP expects to

save significant amounts of water in coming years with the implementation of the Owens Lake Master Project and other water conservation projects related to uses associated with LAA sources.

The average annual long-term LAA delivery between 2015 and 2040, using the 50-year average hydrology from Fiscal Year (FY) 1961/62 to 2010/11, is expected to be approximately 278,000 AFY and to gradually decline to 267,000 AFY due to projected climate change impacts. However, with the anticipated completion of the Owens Lake Master Project by 2024, the projected LAA delivery may increase to 286,000 AFY due to water conserved at Owens Lake, which would offset most of the anticipated long-term losses.<sup>28</sup>

#### (e) Groundwater

LADWP has correlative groundwater rights and extracts groundwater from the San Fernando, Sylmar, and Central groundwater basins. LADWP holds adjudicated extraction and groundwater storage rights in these groundwater basins, meaning that the groundwater supplies and quantities have been assigned by the courts to existing users, which extraction and storage is managed by a court-appointed Watermaster.<sup>29</sup> The San Fernando and Sylmar Basins are subject to the judgment in *City of San Fernando vs. City of Los Angeles*. Per that judgment, pumping must be reported to the court-appointed Upper Los Angeles River Area (ULARA) Watermaster. The Central Basin is also subject to a court judgment in *Central and West Basin Water Replenishment District v. Adams*. Pumping in the Central Basin is reported to Water Replenishment District of Southern California (WRD), which acts as the administrative body of the basin Watermaster.

The San Fernando Basin, which encompasses approximately 112,000 acres of land and comprises 91.2 percent of the ULARA, is the largest basin within the area. The majority of LADWP's groundwater is extracted from the San Fernando Basin. The City has accumulated 537,622 AFY of stored water credits in the San Fernando Basin as of October 2014.<sup>30</sup> The Sylmar Basin, located in the northern part of the ULARA, consists of 5,600 acres of land and comprises 4.6 percent of the ULARA. LADWP has an annual

<sup>28</sup> Los Angeles Department of Water and Power, Water Supply Assessment – 668 South Alameda Street Project, May 16, 2017, pages 29-31.

<sup>29</sup> The main purpose of the Watermaster Program is to ensure water is allocated according to established water rights as determined by court adjudications or agreements by an unbiased, qualified person, thereby reducing water rights court litigation, civil lawsuits, and law enforcement workload. It also helps prevent the waste or unreasonable use of water. The State established the Watermaster Program in 1924 to provide for general public welfare and safety after many injuries and some deaths resulting from disputes over adjudicated water rights. Source: California Department of Water Resources Watermaster Services. Available at: <https://water.ca.gov/Programs/All-Programs/System-Reoperation-Program/Watermaster-Services>. Accessed August 2019.

<sup>30</sup> Los Angeles Department of Water and Power, Water Supply Assessment – 668 South Alameda Street Project, May 16, 2017, page 32.

entitlement of 3,570 AFY from the Sylmar Basin.<sup>31</sup> Annual entitlement to the Central Basin is 17,236 AFY.<sup>32</sup>

The supplies of groundwater in recent years as well as projections through 2040 are shown in **Table IV.N.1-2, Local Groundwater Basin Supply**. For the July 2014–June 2015 period, LADWP extracted 80,097 AFY and 6,948 AFY from the San Fernando and Central Basins, respectively, but no water from the Sylmar basin. 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 projections for groundwater extraction at five-year intervals are shown in Table IV.N.1-2, below. 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.1-2  
LOCAL GROUNDWATER BASIN SUPPLY (AFY)**

<b>Fiscal Year (July-June)</b>	<b>San Fernando</b>	<b>Sylmar</b>	<b>Central</b>
<b>Recent Years Supplies</b>			
2010-2011	44,029	225	5,099
2011-2012	50,244	1,330	9,486
2012-2013	50,550	1,952	6,310
2013-2014	68,784	891	9,727
2014-2015	80,097	0	6,948
<b>Future Supply Projections</b>			
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
SOURCE: Los Angeles Department of Water & Power, Urban Water Management Plan 2015, Exhibit 6B, page 6-4.			

*(f) Metropolitan Water District of Southern California*

The City purchases a large amount of its water supply from MWD. MWD is comprised of 26 member agencies including the City. MWD is the largest water wholesaler for domestic

<sup>31</sup> Ibid.

<sup>32</sup> Los Angeles Department of Water & Power, Urban Water Management Plan 2015, pages 6-15. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>. Accessed September 2019.

and municipal uses in Southern California. All 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 water supply.

Purchases from MWD averaged 65 percent of the City's water supply over the five-year period from FY 2011/12 to 2015/16. The Mayor's Sustainable City pLAn (pLAn) calls for a reduction in purchased imported water by 50 percent by 2025 from the FY 2013/14 level, which was approximately 441,870 AF. To meet targets established by the pLAn, LADWP plans to reduce water demand through increased conservation as well as increased local supply development. Local supply development includes enhancing the ability for groundwater pumping through increased stormwater capture projects, the use of recycled water to meet non-potable demand, groundwater replenishment with recycled water as well as remediation of contaminated or otherwise unusable groundwater supplies. With these initiatives and under average hydrologic conditions, the 2015 UWMP projects MWD purchases to be approximately 65,930 AFY in 2025, which would exceed the pLAn's 50-percent reduction target.

As shown in Table IV.N.1-1, in 2016, LADWP received approximately 317,767 AF of water from MWD. LADWP will continue to rely on MWD to meet a portion of its current and future water needs. Summaries of MWD's individual supplies, along with each supply's challenges and specific responsive actions taken by MWD, are presented below.

(i) *State Water Project*

MWD imports water from the SWP, owned by the State of California and operated by the DWR. The SWP is a water storage and delivery system of pump stations, reservoirs, aqueducts, tunnels, and power plants. The main purpose of the SWP is to divert and store surplus water during wet periods and distribute it to areas throughout the State. Other purposes of the SWP include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento-San Joaquin River Delta. The SWP transports Feather River water stored in and released from the Oroville Dam and conveyed through the Bay-Delta, as well as unregulated flows diverted directly from the Bay-Delta south via the California Aqueduct to four delivery points near the northern and eastern boundaries of MWD's service area.

MWD is one of the 29 water agencies that have long-term contracts with DWR for water service from the SWP, and is the largest agency in terms of the number of people it serves (nearly 19 million), the share of the SWP that it has contracted to receive (approximately 46 percent), and the percentage of total annual payments made to the DWR by agencies with State water contracts (approximately 53 percent in 2015).

The DWR has contracted to provide MWD with 1,911,500 AF of SWP water per year, referred to as MWD's Table A amount. Table A allocations are based on the original projected SWP maximum yield of 4.173 million acre-feet (MAF). Table A is a tool used by DWR to allocate fixed and variable SWP costs and yearly water entitlements to the contractors. Table A contract amounts do not reflect actual deliveries a contractor should

expect to receive. MWD has a Table A contract amount of 1.912 MAF. MWD's full Table A contract amount was first made available to MWD in 2006. In addition to MWD's Table A amount, MWD has long-term agreements in place to obtain additional SWP supplies through five other programs: Article 21; Turnback Pool; Yuba River Accord; San Luis Carryover Storage; and Desert Water Agency (DWA) and Coachella Valley Water District (CVWD) Table A Transfer.<sup>33</sup>

However, due to water quality and supply reliability challenges due to variable hydrology and environmental conditions and events that limit pumping operations, actual SWP deliveries can vary substantially, so that the SWP water contractors, do not receive delivery of their full Table A amounts in various water years. For example, in the most recent drought, actual SWP water deliveries were five percent of the Table A amounts in 2014 and 20 percent of Table A amounts in 2015.<sup>34</sup> For calendar year 2016, the DWR's initial allocation estimate was announced on December 1, 2015 as 10 percent of the Table A amounts for all SWP contractors.<sup>35</sup> The DWR announced several allocation increases in 2016 primarily due to storms that recharged the reservoirs that serve the SWP. Most recently, a storm on April 21, 2016, increased the allocation to 60 percent of the Table A amounts.<sup>36</sup> On November 28, 2016, the DWR approved an initial 2017 allocation estimate of approximately 20 percent of the requested amount for most SWP contractors and approved all requested carryover water for delivery in 2017.<sup>37</sup> Depending on hydrologic and water supply conditions in 2017, the DWR may revise the initial allocations. As stated above, in May 2018, DWR increased the allocations to 35 percent. For 2019, in June, DWR announced they would increase Table A allocations to 75 percent.<sup>38</sup>

<sup>33</sup> Los Angeles Department of Water & Power, Urban Water Management Plan 2015, page 8-14 and 8-15. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>. Accessed September 2019.

<sup>34</sup> Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016. Available at: [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2.4.2\\_Regional\\_Urban\\_Water\\_Management\\_Plan.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf). Accessed September 2019.

<sup>35</sup> California Department of Water Resources, State Water Project, Water Deliveries, Notice to state Water Project Contractors Number 15-07, 2016 state Water Project Initial Allocation---10 Percent, December 1, 2015. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M103.pdf>. Accessed September 2019.

<sup>36</sup> California Department of Water Resources, Notice to State Water Project Contractors, Number 16-06, 2016 State Water Project Initial Allocation---60 Percent, April 21, 2016. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M112.pdf>. Accessed September 2019.

<sup>37</sup> California Department of Water Resources, Notice to State Water Project Contractors, Number 16-09, 2017 state Water Project Initial Allocation---20 Percent, November 28, 2016. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M113.pdf>. Accessed September 2019.

<sup>38</sup> California Department of Water Resources. State Water Project Allocations to Increase to 75 Percent, June 20, 2019. Available at: <https://water.ca.gov/News/News-Releases/2019/June/State-Water-Project-Allocations-Increase-to-75-Percent>. Accessed August, 2019.

*(ii) Challenges to State Water Project Supply<sup>39</sup>*

Litigation and various regulations have created challenges for the SWP. In particular, the listing of several fish species in the Delta as threatened or endangered under the federal and/or California Endangered Species Acts has constrained SWP operations and created more uncertainty in SWP supply reliability. Based on DWR's 2015 State Water Project Delivery Capability Report, future SWP deliveries will continue to be impacted by the restrictions on SWP and Central Valley Project Delta pumping, and climate change, which is altering the hydrologic conditions in the State.

*(iii) Programs Addressing Challenges within the Delta*

In November 2009, Governor Arnold Schwarzenegger passed the 2009 Comprehensive Water Package consisting of four policy bills and a \$11.14 billion bond proposal designed to ensure reliable water supply for California's future and restore the Bay-Delta and other ecologically sensitive areas. Senate Bill X7-7 of the 2009 Comprehensive Water Package established co-equal goals for the Delta: to provide a reliable water supply for California and to protect, restore and enhance the Delta ecosystem. Senate Bill X7-7 also created a new Delta governing structure to achieve these co-equal goals and established a process for determining the consistency of the Bay Delta Conservation Plan (BDCP) with the co-equal goals. The goal of the BDCP is to provide a basis for the issuance of endangered species permits for the operation of the SWP and Central Valley Project, and for improvements related to the Delta conveyance. The BDCP will help reduce the risk posed by seismic activities to water supplies from the Delta, protect drinking water quality and help to alleviate conflicts between water management and environmental protection. The BDCP's success is crucial in providing long term solutions in the Delta and will help to improve and maximize water supply reliability from the SWP, and consequently, MWD's overall reliability. These Statewide initiatives, along with LADWP's local supply and efficiency programs, will ensure that LADWP is better prepared to deal with the natural variability of local water supplies by having more reliable access to supplemental water supply purchases from MWD.

The draft BDCP and associated EIR/EIS were made available for public review and comment in December 2013. In April 2015, State agencies announced a modified preferred alternative referred to as California WaterFix, which includes design changes and refinements to address impacts to Delta communities and various environmental commitments. A separate ecosystem effort referred to as California EcoRestore was also announced with the purpose of restoring at least 30,000 acres of Delta habitat. A Recirculated Draft EIR/Supplemental Draft EIS, which evaluated California WaterFix and cumulative impacts of California EcoRestore, was prepared and released for public

<sup>39</sup> Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016. Available at: [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2.4.2\\_Regional\\_Urban\\_Water\\_Management\\_Plan.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf). Accessed September 2019.



review in July 2015.<sup>40</sup> Together, California WaterFix and California EcoRestore are expected to make significant contributions toward achieving the coequal goals of providing a more reliable water supply in California and protecting, restoring and enhancing the Delta ecosystem established in the Sacramento-San Joaquin Delta Reform Act of 2009. The California DWR and the U.S. Bureau of Reclamation have now completed the Draft Supplemental EIR/EIS for Waterfix which has been released to the public on July 17, 2018.

#### (iv) *The Colorado River*

The MWD owns and operates the Colorado River Aqueduct (CRA), which since 1942, has delivered water from the Colorado River to Southern California. The Colorado River currently supplies approximately 17 percent of Southern California's water needs and counts for approximately 15 percent of LADWP's purchases from the MWD. This source of supply has been secured to MWD through long-standing entitlements secured through multi-state agreements and contracts overseen by the federal government. However, extended drought conditions and increased demand by other users have recently impacted its reliability.

The Colorado River supplies come from watersheds of the Upper Colorado River Basin in the states of Colorado, Utah, and Wyoming. Due to the way the Colorado River supplies are apportioned, snowpack and runoff levels do not impact MWD water supplies in the year in which they occur. Instead, snowpack and runoff impact storage levels at Lake Powell and Lake Mead, which then impact conditions in the future.

As MWD has two principal sources of supply that draw from two different watersheds, MWD has been able to utilize supplies from the Colorado River to offset reductions in SWP supplies and buffer impacts of the California drought. MWD plans to use CRA deliveries, storage reserves, and supplemental water transfers and purchases to meet regional demands.

California is apportioned 4.4 million AFY and one-half of any surplus that may be available for use, collectively, in Arizona, California, and Nevada due to the Quantification Settlement Agreement (QSA) which was completed in October 2003.<sup>41</sup> In addition, California has historically been allowed to use Colorado River water apportioned to, but not used by, Arizona or Nevada. Since 2003, due to increased consumption, there has been no such unused water available to California. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under a 1931 priority system governing allotments to California. This is the last priority within California's basic apportionment of

<sup>40</sup> Bay Delta Conservation Plan, The Environmental Review Process, <https://www.watereducation.org/find/results/bay%20delta%20conservation%20plan%20environmental%20review> Accessed August 2019.

<sup>41</sup> San Diego County Water Authority. Quantification Settlement Agreement website, <http://www.sdcwa.org/quantification-settlement-agreement>, accessed August 2019.

4.4 million AF. Beyond the basic apportionment, MWD holds the fifth priority right to 662,000 AF of additional water.

The 2003 QSA enabled California to implement major Colorado River water conservation and transfer programs, stabilizing water supplies for 75 years and reducing the State's demand on the river to its 4.4 million AFY entitlement. In addition, the Agreement also provided a restoration path for the environmentally sensitive Salton Sea. The completion of the QSA required the combined efforts and commitment of the San Diego County Water Authority (SDCWA), the Coachella Valley Water District (CVWD), the Imperial Irrigation District, the MWD, the State of California, and the U.S. Department of the Interior. Statewide benefits include reducing California's overdependence on the Colorado River, restoration of the Salton Sea, and providing more than 30 million AF over the life of the transfer program.<sup>42</sup>

Historically, MWD has been able to claim most of its legal entitlement of Colorado River and could divert over 1.2 AF in any year, but persistent drought conditions since 1999 have contributed to a decrease in these claims. The recent six-year drought from approximately 2011-2017 has been resulted in major reductions in water deliveries from the Colorado River. MWD's CRA supplies total approximately 923,000 AF in calendar year 2015.

Under the Colorado River Basin Project Act of 1968, the Secretary is required to issue an Annual Operating Plan describing CRA operations and projected releases. Considering drought conditions and declining storages, the 2014 release for Lake Powell was 7.48 million AF, which was the lowest since the filling of the reservoir in the 1960s. Moreover, reservoir storages along the CRA have declined dramatically.

The shortage has increased management efforts by the Federal Government and states holding Colorado River water rights. In May 2005, the Secretary directed the U.S. Bureau of Reclamation (BOR) to initiate the "Development of Lower Colorado River Basin Shortage Guidelines and Coordinated Management Strategies for Lakes Powell and Mead Under Low Reservoir Conditions." These were the first guidelines to address shortage conditions, as opposed to normal and surplus conditions. Since May 2005, and in response to the Secretary's directive, the seven Basin States have reached agreement to transform management of the Colorado River system water through conjunctive managements of Lakes Mead and Powell, and the adoption of shortage guidelines.

In November 2007, BOR issued a Final EIS including the new federal guidelines concerning operation of the Colorado River system reservoirs. The Secretary issued the final guidelines through a Record of Decision signed in December 2007. The Record of Decision and accompanying agreement among the Colorado River Basin States protect reservoir levels by reducing deliveries during drought periods encouraging agencies to develop conservation programs, and allowing the states to develop and store new water

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<sup>42</sup> San Diego County Water Authority. Quantification Settlement Agreement for the Colorado River. Available at: <http://www.sdcwa.org/sites/default/files/qsa-fs.pdf>, accessed August 2019.

supplies. The Colorado River Basin Project Act of 1968 insulates California from shortages in all but the most extreme hydrologic conditions.

In January 2017, the 24-month look-ahead-study by BOR reported that Lake Powell's operations in water year 2017 will be governed by the Upper Elevation Balancing Tier, with an initial water year release volume of 8.23 million AF and the potential for an April adjustment to equalization or balancing releases in April 2017. The January 2017 24-Month Study indicated that an April adjustment to balancing releases is projected to occur and Lake Powell is projected to release 9.0 million AF in water year 2017.

(v) *Additional MWD Actions to Address Supply*

To improve water supply reliability for the entire Southern California region, MWD has been pursuing voluntary water transfer, groundwater banking, and exchange programs with state and federal agencies, public and private water districts, and private entities. Programs include the Arvin-Edison Storage Program; the Semitropic Storage Program; the San Bernardino Storage Program; the San Gabriel Valley MWD Exchange Program; the Antelope Valley East Kern Water Agency Exchange and Storage Program; the Kern-Delta Water District Storage Program; the Mojave Storage Program; and the Central Valley Transfer Programs.<sup>43</sup>

In addition, MWD continues to develop plans and make efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans.<sup>44</sup> As discussed above, MWD's long-term plans to meet its member agencies reliability needs include improvements to the SWP as outlined in the California WaterFix and EcoRestore Plans, conjunctive management efforts on the Colorado River, water transfer programs and outdoor conservation measures, and development of additional local resources, such as recycling brackish water desalination and seawater desalination.

MWD also has more than five million AF of storage capacity in available reservoirs and banking/transfer programs, with approximately 1.21 million AF, inclusive of Intentionally Created Surplus, in that storage, and 626,000 AF in emergency storage as of January 1, 2015. MWD has plans to increase near-term storage capacity, with storage balances estimated to be 1.1 to 1.5 million AF depending on SWP and CRA supply conditions. As described below in the MWD's 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under average year, single dry-year and multiple dry-year hydrologic conditions.

<sup>43</sup> Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016. Available at: [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2.4.2\\_Regional\\_Urban\\_Water\\_Management\\_Plan.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf). Accessed September 2019.

<sup>44</sup> California Department of Water Resources, Water Conditions Update, June 2016.

(g) *Water Recycling with Stormwater Capture and Water Conservation*

In addition to the primary LADWP water sources discussed above, stormwater capture, LADWP anticipates that water conservation and recycling will play an increasing role in meeting future water demands. LADWP has implemented programs to address these issues, with efforts underway to further promote and increase the capacity of these programs. LADWP is committed to supplying a higher percentage of the City's water demand through local water supply development, increasingly reducing its reliance on imported sources over time. This commitment is reflected in the adoption of numerous water conservation ordinances and through provisions of the regularly revised UWMP, as described further in the Regulatory discussion below. Through integrated planning the City works closely with MWD, the City of Los Angeles Department of Public Works Bureau of Sanitation, other regional water providers, and various stakeholder groups to develop and implement programs that reduce overall water use. These strategies are intended to ensure a reliable water supply for Los Angeles residents and businesses.<sup>45</sup>

(h) *Global Warming and Climate Change*

Potential impacts of climate change on California's water resources include changes in snow pack, sea level, and river flows. Climate change is also expected to result in more variable weather patterns that can lead to longer and more severe drought. In addition, sea level rise will continue to threaten the sustainability of the Sacramento-San Joaquin Delta, which include crucial SWP storage and infrastructure facilities.<sup>46</sup> In response to the California's Governor's Executive Order S-3-05, DWR prepared a report on this issue in May 2009, entitled "Using Future Climate Projections to Support Water Resources Decision Making in California," which presents an overview of the advances that DWR has made toward using future climate projection information to support decision making by quantifying possible impacts to water resources for a range of future climate scenarios. Advances have been made in using future climate projection information in water resources planning in California, including improved understanding of how well selected climate models represent historical climate conditions and refined methodologies for representing stream flows, outdoor urban and agricultural water demands, and sea level rise in planning tools. The range of impacts presented indicated the need for adaptation measures to improve the reliability of future water supplies in California.<sup>47</sup>

DWR has further addressed the issue of climate change and how it can affect California's water supply, by undertaking mitigation and adaptation measures. DWR is a member of the California Climate Action Registry and is listed as a "Climate Action Leader" for reporting its greenhouse gas emissions for three consecutive years (2007, 2008 and

<sup>45</sup> Los Angeles Department of Water & Power, Urban Water Management Plan 2015.

<sup>46</sup> California Department of Water Resources, Climate Change Program. Available at: <https://water.ca.gov/Programs/All-Programs/Climate-Change-Program>. Accessed August 2019.

<sup>47</sup> California Department of Water Resources, "Using Future Climate Projections to Support Water Resources Decision Making in California," May 2009, page 2. Accessed August 2019.

2009), and having the data verified by third party audit.<sup>48</sup> In 2008, DWR adopted the “Climate Change Adaptation Strategy,” which urges a new approach to California’s water and other natural resources in the face of changing climate.<sup>49</sup> In 2009, DWR adopted its own Sustainability Policy, and in 2010, DWR established clear and measurable goals for sustainability implementations.<sup>50, 51</sup>

In December 2010, DWR prepared a survey which presents summaries of 13 different reports and studies prepared by DWR addressing climate change entitled “Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report.” A variety of approaches to characterize and analyze future climate have been used in various DWR planning studies. The December 2010 paper summarized the approaches and methodologies that have been used since 2006. The report was the first comprehensive comparative look at the different approaches, their strengths and weaknesses, and how they have been used in past studies. This work laid the groundwork for a future DWR study aimed at developing a standard framework and a consistent set of approaches to be used for characterizing and analyzing climate change in future DWR planning studies and to provide guidance for DWR partners and grantees.<sup>52</sup>

In 2011, DWR in cooperation with the U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, and Resources Legacy Fund completed the Climate Change Handbook for Regional Water Planning. The Climate Change Handbook provides a framework for considering climate change in water management planning. Key decision considerations, resources, tools, and decision options are presented to guide resource managers and planners as they develop means of adapting their programs to a changing climate. The Climate Change Handbook is focused on the California Integrated Regional Water Management Planning (IRWMP) process, for incorporating climate change into the watershed or water supply planning process. The Climate Change Handbook considers both climate change adaptation (reduction of impacts) and mitigation (GHG reduction).

<sup>48</sup> California Climate Action Registry, Climate Action Leaders; [climateactionreserve.org/about-us/california-climate-action-registry/](http://climateactionreserve.org/about-us/california-climate-action-registry/). Accessed August 2019.

<sup>49</sup> California Department of Water Resources, Climate Change Adaptation Strategies for California’s Water: Managing an Uncertain Future, October 2008; available at: <https://www.amwa.net/galleries/climate-change/CaliforniaWhitePaper-Oct08.pdf>. Accessed May 8, 2016.

<sup>50</sup> California Department of Water Resources, Memorandum to All DWR Employees, “Sustainability Workgroup,” April 22, 2009; available at: <https://water.ca.gov/LegacyFiles/climatechange/docs/Final-DWR-ClimateActionPlan.pdf>. Accessed August, 2019.

<sup>51</sup> California Department of Water Resources, Memorandum to All DWR Employees, “Sustainability Targets,” September 20, 2010; available at: [https://planning.lacity.org/eir/8150Sunset/References/4.K.1.%20Water%20Supply/WS.03\\_Sustainability%20Targets\\_9.20.10.pdf](https://planning.lacity.org/eir/8150Sunset/References/4.K.1.%20Water%20Supply/WS.03_Sustainability%20Targets_9.20.10.pdf). Accessed August, 2019.

<sup>52</sup> California Department of Water Resources, “Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report,” December 2010, at page v; available at: <https://cawaterlibrary.net/document/climate-change-characterization-and-analysis-in-california-water-resources-planning-studies/>. Accessed August, 2019.

Quantitative tools and techniques for addressing both are introduced and discussed in order to prepare comprehensive IRWMPs.<sup>53</sup>

In 2014, DWR released up-to-date climate change information, including hydrologic impacts and projections at the Statewide and regional levels, adaptation strategies, and energy intensity of water supplies in the California Water Plan Update 2013 (California Water Plan), discussed briefly above. The California Water Plan is the strategic plan for managing and developing water resources Statewide for current and future generations by providing a collaborative planning framework 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 California 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.<sup>54</sup> A stated goal of the California Water Plan is to prepare for climate uncertainty by developing adaptation strategies and investing in a diverse set of actions that reduce the risk and consequences posed by climate change, as well as make the system more resilient to change and increase the sustainability of water and flood management systems and the ecosystems they depend on.<sup>55</sup> Two actions to address climate change include: 1) use and reuse water more efficiently through conservation, recycling and reuse, and 2) expand conjunctive management of multiple water supply sources with existing and new surface and groundwater storage.<sup>56</sup>

While climate change is expected to continue through at least the end of this century, the magnitude and nature of future changes are uncertain. This uncertainty serves to complicate the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood.<sup>57</sup> However, preliminary modeling conducted by DWR indicates that under one climate

<sup>53</sup> California Department of Water Resources, Climate Change, Climate Change Handbook for Regional Water Planning, 2011. Available at: [https://www.esf.edu/glrc/library/documents/ClimateChangeHandbookforRegionalWaterPlanning\\_EPA\\_2011.pdf](https://www.esf.edu/glrc/library/documents/ClimateChangeHandbookforRegionalWaterPlanning_EPA_2011.pdf). Accessed August 2019.

<sup>54</sup> California Department of Water Resources, California Water Plan, available at: <https://water.ca.gov/Programs/California-Water-Plan> Accessed August 2019.

<sup>55</sup> California Department of Water Resources, California Water Plan, Update 2013, page 10A, available at: <https://water.ca.gov/Programs/California-Water-Plan/Previous-Updates/Technical-Documentation>. Accessed August 2019.

<sup>56</sup> Ibid., page 11A.

<sup>57</sup> California Department of Water Resources, "Progress on Incorporating Climate Change into Management of California's Water Resources," July 2006, page 2-54; [https://www.researchgate.net/publication/226868616\\_Progress\\_on\\_Incorporating\\_Climate\\_Change\\_In\\_to\\_Management\\_of\\_California's\\_Water\\_Resources](https://www.researchgate.net/publication/226868616_Progress_on_Incorporating_Climate_Change_In_to_Management_of_California's_Water_Resources). Accessed August 2019.

change scenario, average yearly SWP Table A deliveries in 2050 could be reduced by 10.2 percent.<sup>58, 59</sup>

In light of these conclusions, both governmental agencies and non-governmental organizations recommend that water decision-makers operate existing water systems to allow for increased flexibility. Other recommendations include incorporating climate change research into infrastructure design, conjunctively managing surface water and groundwater supplies, and integrating water and land use practices. As a result, in March 2002, MWD's Board of Directors adopted climate change policy principles that relate to water resources. A second expert panel on climate change was convened in 2007 to present and explain new findings from the climate change science community. Also in 2007, MWD became one of the founding members of the Water Utility Climate Alliance (WUCA), which provides a collaborative avenue for knowledge sharing and research support on climate change. These climate change principles and research results are reflected in MWD's 2015 Integrated Water Resources Plan (IRP), discussed above.<sup>60</sup> Further, in response to climate change and uncertainty, MWD's 2015 UWMP incorporated three basic elements to promote adaptability and flexibility, important in addressing impacts of climate change: conservation, groundwater recharge, and water recycling.<sup>61</sup> The 2015 UWMP addresses climate change in Chapter 12 and sets forth both LADWP and MWD adaptation and mitigation strategies. The MWD's 2015 UWMP identifies programs and policies to address climate change such as: exploring water supply/energy relationships to increase efficiencies; participating in the Climate Registry; acquiring green fleet vehicles; developing solar power at two water treatment plants; and identifying and pursuing development of green renewable water and energy programs that support the efficient and sustainable use of water.<sup>62</sup>

On April 30, 2015, State and federal agencies identified a new, preferred alternative that advances water system improvements and habitat restoration as two separate projects, California WaterFix and California EcoRestore. Long-term solutions to resolving Delta challenges will be evaluated against the following six benchmarks: 1) restore and protect

<sup>58</sup> Ibid., page 4-49.

<sup>59</sup> Table A water deliveries represent the schedule of the maximum amount of water that water contractors to the DWR may receive annually from the SWP. There are 29 water contractors who have signed long term contracts with the DWR for a total of 4.173 million acre feet per year. Table A deliveries are not guarantees of annual delivery amounts but are used to allocate individual contractors' portion of the delivery amounts available.

<sup>60</sup> Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report No. 1518, January 2016; [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2015%20IRP%20Update%20Report%20\(web\).pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2015%20IRP%20Update%20Report%20(web).pdf) Accessed August 2019.

<sup>61</sup> Metropolitan Water District of Southern California, The Regional Urban Water Management Plan, November 2010. Available at: <http://www.mwdh2o.com/WWAMaterials%20Provided%20to%20WaterDM/2010%20RUWMP.pdf#search=2010%20Regional%20Urban%20Water%20Management%20Plan>. Accessed August 2019.

<sup>62</sup> Metropolitan Water District of Southern California, 2015 Draft Urban Water Management Plan, March 2016, page 2-28. Available at: [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/2015\\_UWMP.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/2015_UWMP.pdf). Accessed August 2019.

SWP deliveries; 2) improve export water quality; 3) promote flexible pumping operations in a dynamic Delta environment; 4) enhance Delta ecosystems fishery habitat; 5) reduce seismic risks; and 6) reduce climate change risk.<sup>63</sup> MWD has demonstrated a commitment to addressing climate change by evaluating the vulnerability of its water systems to global warming impacts and has developed appropriate response strategies and management tools that account for the impacts of climate change on future water supplies. For further discussion on the effects of global climate change, refer to Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR.

(i) *LADWP Service Area Water Demand and Reliability Assessment*

LADWP's 2015 UWMP provides water supply and demand projections in five-year increments to 2040 for single dry year, multi-dry years, and average weather year; refer to **Table IV.N.1-3**, *Service Area Reliability Assessment for Single Dry Year*, **Table IV.N.1-4**, *Service Area Reliability Assessment for Multi-Dry Years (2011-2015)*, and **Table IV.N.1-5**, *Service Area Reliability Assessment for Average Weather Year*.

These tables indicate that LADWP can provide reliable water supplies under all three hydrologic scenarios through the 25-year planning period.

LADWP's 2015 UWMP water supply and demand projections based on projected population estimates provided by the Southern California Association of Governments (SCAG) in its 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (2012-2035 RTP/SCS). Since the preparation of the 2015 UWMP, new growth forecasts have become available in SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). However, the 2016 forecast is only slightly higher than the 2012 forecast in terms of current (2017) estimates and future (2040) projections.

(1) Wastewater

(a) *Wastewater Generation and Infrastructure*

LASAN operates more than 6,700 miles of public sewers and serves the needs of more than four million customers in the City of Los Angeles in addition to 29 contracting cities and agencies. LASAN provides service to two service areas (i.e., the Hyperion Service Area and the Terminal Island Service Area), which together cover approximately 600 square miles.<sup>64</sup>

<sup>63</sup> The Metropolitan Water District of Southern California, State-Federal Proposal for Delta Restoration, [http://www.mwdh2o.com/PDF\\_About\\_Your\\_Water/Delta\\_CalWaterFixOverview.pdf](http://www.mwdh2o.com/PDF_About_Your_Water/Delta_CalWaterFixOverview.pdf). Accessed August, 2019.

<sup>64</sup> LA Sanitation Website, Sewers, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?\\_adf.ctrl-state=1186mdvh8u\\_4&\\_afLoop=10107182372196613#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=1186mdvh8u_4&_afLoop=10107182372196613#!), accessed August 2019.



**TABLE IV.N.1-3**  
**SERVICE AREA RELIABILITY ASSESSMENT FOR SINGLE DRY YEAR**

Demand and Supply Projections (in acre-feet)		Single Dry Year (FY 2014-15) Fiscal Year Ending on June 30			
Forecast Year	2020	2025	2030	2035	2040
Total Water Demand <sup>1</sup>	642,400	676,900	685,500	694,900	709,500
Plan Water Demand Target	485,600	533,000	540,100	551,100	565,600
Existing/Planned Supplies					
Conservation (Additional Active <sup>2</sup> and Passive <sup>3</sup> after FY 14/15)	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct <sup>4</sup>	32,200	51,900	51,400	51,000	50,600
Groundwater <sup>5</sup> (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
Stormwater Reuse (Harvesting)	100	200	300	300	400
Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	323,470	369,470	380,470	396,670	398,970
MWD Water Purchases					
With Existing/Planned Supplies	318,930	307,430	305,030	298,230	310,530
Total Supplies	642,400	676,900	685,500	694,900	709,500
Potential Supplies					
Water Transfers <sup>6</sup>	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	278,930	267,430	265,030	258,230	270,530
Total Supplies	642,400	676,900	685,500	694,900	709,500

CRA = Colorado River Aqueduct; MAF = Million acre-feet; SDCWA = San Diego County Water Authority;

<sup>1</sup> Total Demand with existing passive conservation.

<sup>2</sup> Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-2015.

<sup>3</sup> Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAn.

<sup>4</sup> LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24.

<sup>5</sup> Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-2020 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

<sup>6</sup> Potential water transfer occurs in dry years with stored water acquired in average and wet years.

SOURCE: Los Angeles Department of Water & Power, 2015, Urban Water Management Plan, Exhibit 11F, page 11-10.

**TABLE IV.N.1-4**  
**SERVICE AREA RELIABILITY ASSESSMENT FOR MULTI-DRY YEARS (2011-2015)**

<b>Demand and Supply Projections (in acre-feet)</b>	<b>Multiple Dry Years (FY 2012-13 to FY 2014-15) Fiscal Year Ending on June 30</b>				
<b>Forecast Year</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>
<b>Total Water Demand<sup>1</sup></b>	<b>642,400</b>	<b>676,900</b>	<b>685,500</b>	<b>694,900</b>	<b>709,500</b>
<b>pLAn Water Demand Target</b>	<b>485,600</b>	<b>533,000</b>	<b>540,100</b>	<b>551,100</b>	<b>565,600</b>
<b>Existing/Planned Supplies</b>					
Conservation (Additional Active <sup>2</sup> and Passive <sup>3</sup> after FY 14/15)	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct <sup>4</sup>	33,500	53,200	52,800	52,400	51,900
Groundwater <sup>5</sup> (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
Stormwater Reuse (Harvesting)	100	200	300	300	400
Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	324,770	370,770	381,870	398,070	400,270
<b>MWD Water Purchases</b>					
With Existing/Planned Supplies	317,630	306,130	303,630	296,830	309,230
Total Supplies	642,400	676,900	685,500	694,900	709,500
Potential Supplies					
Water Transfers <sup>6</sup>	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
<b>MWD Water Purchases</b>					
With Existing/Planned/Potential Supplies	277,630	266,130	263,630	256,830	269,230
<b>Total Supplies</b>	<b>642,400</b>	<b>676,900</b>	<b>685,500</b>	<b>694,900</b>	<b>709,500</b>

CRA = Colorado River Aqueduct; MAF = Million acre-feet; SDCWA = San Diego County Water Authority;

<sup>1</sup> Total Demand with existing passive conservation.

<sup>2</sup> Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-2015.

<sup>3</sup> Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAn.

<sup>4</sup> LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24.

<sup>5</sup> Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-2020 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

<sup>6</sup> Potential water transfer occurs in dry years with stored water acquired in average and wet years.

SOURCE: Los Angeles Department of Water & Power, 2015, Urban Water Management Plan, Exhibit 11G, page 11-11.

**TABLE IV.N.1-5**  
**SERVICE AREA RELIABILITY ASSESSMENT FOR AVERAGE WEATHER YEAR**

Demand and Supply Projections (in acre-feet)	Average Weather Conditions (FY 1961/62 to 2010/11) Fiscal Year Ending on June 30				
Forecast Year	2020	2025	2030	2035	2040
Total Water Demand <sup>1</sup>	611,800	644,700	652,900	661,800	675,700
pLAn Water Demand Target	485,600	533,000	540,100	551,100	565,600
Existing/Planned Supplies					
Conservation (Additional Active <sup>2</sup> and Passive <sup>3</sup> after FY 14/15)	125,800	110,900	111,600	109,100	108,100
Los Angeles Aqueduct <sup>4</sup>	275,700	293,400	291,000	288,600	286,200
Groundwater <sup>5</sup> (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
Stormwater Reuse (Harvesting)	400	800	1,200	1,600	2,000
Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	536,370	578,770	587,470	601,170	600,770
MWD Water Purchases					
With Existing/Planned Supplies	75,430	65,930	65,430	60,630	74,930
Total Supplies	611,800	644,700	652,900	661,800	675,700
Potential Supplies					
Water Transfers <sup>6</sup>	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	35,430	25,930	25,430	20,630	34,930
Total Supplies	611,800	644,700	652,900	661,800	675,700

CRA = Colorado River Aqueduct; MAF = Million acre-feet; SDCWA = San Diego County Water Authority;

<sup>1</sup> Total Demand with existing passive conservation.

<sup>2</sup> Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-2015.

<sup>3</sup> Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAn.

<sup>4</sup> LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24.

<sup>5</sup> Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-2020 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

<sup>6</sup> Potential water transfer occurs in dry years with stored water acquired in average and wet years.

SOURCE: Los Angeles Department of Water & Power, 2015 Urban Water Management Plan, Exhibit 11H, page 11-12.

The approximately 1.16-acre Project Site is currently improved with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings which generate approximately 6,080 gallons per day (gpd) of wastewater (see Table IV.N.1-7, below, for a detailed breakdown including specific factors used). As shown in Table IV.N.1-7, the average dry weather flow (or referred to as “wastewater flow”) from the Project Site due to existing conditions is 0.009 cubic feet per second (cfs) and 0.31 cfs during the peak dry weather flow. Dry weather flow refers to the wastewater flow in a sewer system during periods of dry weather with minimum infiltration. Peak dry weather flow is calculated by multiplying the average dry weather flow by 3.3. Unlike dry weather flows, wet weather flows include sewage flows and runoff that infiltrates into the sanitary sewer systems during a storm event.

The Project Site’s apartment buildings discharge into an eight-inch line in Argyle on the west, while the Site’s residences along Vista Del Mar discharge into an eight-inch line in Vista Del Mar on the east. The sewer line in Vista Del Mar traverses to Argyle south of the Project Site and all flow is concentrated in Argyle before reaching Hollywood Boulevard, the next street south. There are two existing laterals in Argyle and two existing laterals in Vista Del Mar.

The Project Site is located near the most upstream ends of the existing sewer mains in both Argyle, and Vista Del Mar. At Argyle, the Project Site is the first connection to the main, and no other upstream flow is expected. At Vista Del Mar, the sewer main built in 1916 stops at the property frontage. A new extension to that line was built in 1944 by the City for apparent maintenance purposes to join the manhole located at Vista Del Mar and Yucca. The only offsite flow contributing to this point may be from the property at 6201 Yucca and would have been accounted for in the provided WWSI as current flow. Because the Project Site is at the upstream ends of the existing sewer mains, no existing capacity constraints occur in the adjacent sewer system.

#### *(b) Wastewater Treatment*

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 Terminal Island Service Area includes the Terminal Island Treatment Plant (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.<sup>65</sup>

The Hyperion Service Area includes the Hyperion Water Reclamation Plant (HWRP) in Playa del Rey, the Donald C. Tillman Water Reclamation Plant (TWRP) in the City of Van Nuys, and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in the City of

<sup>65</sup> LA Sanitation Website, Terminal Island Water Reclamation Plant, [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-tiwrp?\\_adf.ctrl-state=16ffny6zeu\\_5&\\_afLoop=2840224649517616#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-tiwrp?_adf.ctrl-state=16ffny6zeu_5&_afLoop=2840224649517616#!), accessed August 2019.

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.<sup>66</sup> The Project Site is located within the Hyperion Service Area and its wastewater would be conveyed to and treated at the HWRP.<sup>67</sup>

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 LAGWRP.<sup>68</sup> On average, 275 million gallons of wastewater enters the HWRP on a typical dry weather day.<sup>69</sup> 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.<sup>70</sup> 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.<sup>71</sup> 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.<sup>72</sup>

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

<sup>66</sup> LA Sanitation Website, Water Reclamation Plants, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?\\_adf.ctrl-state=7rr12ut0p\\_938&\\_afLoop=10126401033577688#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=7rr12ut0p_938&_afLoop=10126401033577688#!), accessed August 2019.

<sup>67</sup> 6220 Yucca Street – Request for Wastewater Services Information, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017.

<sup>68</sup> LA Sanitation Website, Hyperion Water Reclamation Plant, [https://www.lacitysan.org/san/faces/wcnaveexternalld/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=1186mdvh8u\\_393&\\_afLoop=10107387348315793#!](https://www.lacitysan.org/san/faces/wcnaveexternalld/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1186mdvh8u_393&_afLoop=10107387348315793#!), accessed August 2019.

<sup>69</sup> Ibid.

<sup>70</sup> Ibid.

<sup>71</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants. Available at: [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?\\_adf.ctrl-state=17vn294put\\_460&\\_afLoop=7305577043022714#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=17vn294put_460&_afLoop=7305577043022714#!). Accessed August 2019.

<sup>72</sup> Ibid.

(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) Solid Waste

The Project Site is currently improved with one single-family residence, one duplex, one studio apartment over a detached duplex garage, and three, two-story apartment buildings and associated carports and paved surface parking areas, all of which would be demolished and removed to allow for development of the Project. The uses on the Project Site generate a total of approximately 538 pounds per day, or 98.19 tons annually of solid waste. (See Table IV.N.1-11 for a detailed breakdown including specific factors used). Based on the City's average rate of 76.4 percent, approximately 127 pounds of the daily waste generated (538 lbs/day) is disposed of at landfills or approximately 23 tons per year.<sup>73</sup>

### (a) Solid Waste Disposal Services

Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Los Angeles Sanitation (LASAN) has the responsibility to develop plans and strategies to manage and coordinate the solid waste system in the City of Los Angeles and to address the disposal needs of the City of Los Angeles as a whole. 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 primarily collect solid waste generated from large multi-family residential, commercial, and industrial properties. Solid waste management includes solid waste source reduction, recycling, composting, transformation, and disposal. The City does not own or operate any landfill facilities. The majority of the solid waste generated within the City is disposed of at Los Angeles County landfills.

### (b) Regional Landfill Capacity

Regional planning for the provision of landfill services is provided by the County of Los Angeles which, in response to the California Integrated Waste Management Act of 1989, prepared and administers the CoLWMP. As part of its obligations, Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of CoLWMP Annual Reports. Within each annual report, future landfill disposal needs over the ensuing 15-year planning horizon are addressed, in part by determining the available landfill capacity. As discussed in the County of Los Angeles Countywide Integrated Waste

<sup>73</sup> City of Los Angeles Sanitation website, Recycling data, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?\\_afLoop=10612365830083093&\\_afWindowMode=0&\\_afWindowId=18dr61h0pb&\\_adf.ctrl-state=g402ecklk\\_1912#!%40%40%3F\\_afWindowId%3D18dr61h0pb%26\\_afLoop%3D10612365830083093%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dg402ecklk\\_1916](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afLoop=10612365830083093&_afWindowMode=0&_afWindowId=18dr61h0pb&_adf.ctrl-state=g402ecklk_1912#!%40%40%3F_afWindowId%3D18dr61h0pb%26_afLoop%3D10612365830083093%26_afWindowMode%3D0%26_adf.ctrl-state%3Dg402ecklk_1916), accessed August 2019.

Management Plan 2015 Annual Report (“CoLWMP 2015 Annual Report”) (published in December 2016).<sup>74</sup> The CoLWMP 2015 Annual Report shows a downward disposal trend from 2005 to 2010, with a plateau between the years 2010 through 2014, with an increase from 2014 to present.<sup>75</sup> In 2015, Los Angeles County disposed of 9,457,378 tons of materials, compared to approximately 12.5 million tons in 2005. Of that amount, the majority was accommodated by in-County Class III landfills<sup>76</sup> (4,772,823 tons), followed by exports to out-of-County landfills (4,127,261 tons) and transformation facilities (557,294 tons); refer to **Table IV.N.1-6, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County**.<sup>77</sup> The remaining disposal capacity for the County’s Class III landfills is estimated at approximately 114 million tons.<sup>78</sup> It is estimated that in 2022 cumulative demand for disposal will be 58,822,376 tons, or 75 percent of the remaining capacity.<sup>79</sup> The 2015 average daily disposal for in-County landfills was 15,157 tons per day, and the maximum daily capacity was 30,449 tons per day.<sup>80</sup>

Of the various landfills serving the City of Los Angeles, Sunshine Canyon Landfill is the largest recipient of non-hazardous solid waste disposal materials, i.e. Class III waste materials. This landfill had a remaining capacity of 72.61 million tons in 2015, with an expected life expectancy of 22 years. More notably, the maximum daily capacity for the landfill is 12,100 tons per day and the 2015 disposal rate was 7,701 tons per day.<sup>81</sup>

In 2015, the annual amount of Countywide disposed inert waste materials, such as earth, landscaping, concrete and asphalt was 263,933 tons.<sup>82</sup> For the purpose of long-term disposal capacity planning, a Countywide diversion rate of 65 percent was assumed for 2015. Based on a total disposal of 9.36 million tons (excluding inert waste and imports) and the 65 percent diversion rate, the County generated approximately 26.74 million tons.<sup>83</sup>

<sup>74</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, prepared by County of Los Angeles Department of Public Works, dated December 2016.

<sup>75</sup> Ibid.

<sup>76</sup> Landfills within Los Angeles County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while construction waste, yard trimmings, and earth-like waste are disposed of in unclassified (inert) landfills. Source: Boyle Heights Mixed-Use Community Project, City of Los Angeles, Environmental Impact Report, SCH. No. 2008061123, page IV.L-84. Available at: <https://planning.lacity.org/eir/BoyleHeights/DEIR/index.html>. Accessed September 2019.

<sup>77</sup> Ibid, page 25.

<sup>78</sup> Ibid, page 32.

<sup>79</sup> Ibid, Appendix E-2, Table 5, Los Angeles County Solid Waste Disposal Capacity Need Projection.

<sup>80</sup> Ibid. Appendix E-2, Table 1, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

<sup>81</sup> Ibid.

<sup>82</sup> Ibid, page 25.

<sup>83</sup> Ibid, page 26.

**TABLE IV.N.1-6**  
**REMAINING PERMITTED DISPOSAL CAPACITY OF EXISTING SOLID WASTE DISPOSAL FACILITIES**  
**IN LOS ANGELES COUNTY**

Facility (Solid Waste Facility Permit Number)	2015 Annual Waste Disposal Received (Million Tons)			Estimated Remaining Permitted Capacity (as of December 31, 2015)		Remaining Life (Years)
	In-County	Out-of-County	Total	Million Tons	Million Cubic Yards	
Antelope Valley (19-AA-5624)	0.484	0.005	0.489	12.51	17.88	23
Burbank (19-AA-0040)	0.032	0.000	0.032	2.97	4.95	38
Calabasas (19-AA-0056)	0.270	0.012	0.282	6.25	13.93	14
Chiquita Canyon (19-AA-0052)	1.054	0.021	1.075	0.76	0.77	1
Lancaster (19-AA-0050)	0.109	0.005	0.114	10.57	14.10	26
Pebbly Beach (19-AA-0061)	0.004	0.000	0.004	0.05	0.07	1
San Clemente (19-AA-0063)	0.0004	0.000	0.0004	0.04	0.32	13
Scholl Canyon (19-AA-0012)	0.284	0.000	0.284	3.53	7.30	17
Sunshine Canyon (19-AA-2000)	2.403	0.000	2.403	72.61	82.51	12
Whittier (Savage Canyon) (19-AH-001)	0.090	0.000	0.090	5.08	8.46	40
<b>Total</b>	<b>4.729</b>	<b>0.044</b>	<b>4.773</b>	<b>114.37</b>	<b>150.27</b>	<b>--</b>
<b>Permitted Inert Landfills</b>						
Azusa Land Reclamation (19-AA-0013)	0.193	0.071	0.264	57.56	46.05	30
<b>Total</b>	<b>0.193</b>	<b>0.071</b>	<b>0.264</b>	<b>57.56</b>	<b>46.05</b>	
<b>Transformation Facilities</b>				<b>Available Average Daily Capacity (tpd)</b>		
Commerce Refuse To-Energy (19-AA-0506)	0.100	0.012	0.112		400	
Southeast Resource Recovery Facility (19-AK-0083)	0.401	0.044	0.445		1,370	
<b>Total</b>	<b>0.501</b>	<b>0.056</b>	<b>0.557</b>		<b>1,770</b>	
<b>Out-of-County Disposal</b>						
Los Angeles County Waste Exported in 2015 to Out-of-County Class III Disposal Facilities = <b>4,127,261 tons</b>						

NOTE: tpd = tons per day;

SOURCE: County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Appendix E-2, Table 1, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County, prepared by County of Los Angeles Department of Public Works, dated December 2016.

There is one permitted Inert Waste Landfill that has a full solid waste facility permit (Azusa Land Reclamation Landfill) in Los Angeles County as of 2013. The remaining capacity of this landfill is estimated at 52,750,160 cubic yards (29,671,965 tons) with a projected



closure date of year 2046.<sup>84</sup> 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, processing approximately 2.36 million tons in 2015.<sup>85</sup>

Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills. As described in the Regulatory Framework section below, the County has prepared and is updating a Countywide Integrated Waste Management Plan, including annual reports and a master plan for meeting waste disposal needs through 2030. The CoLWMP 2015 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2030 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).<sup>86</sup>

(c) *Hazardous Waste Disposal (Class I Landfills)*

Hazardous Waste are disposed of at Class I landfills. The closest Class I landfill to the Project Site is the Kettleman Hills Facility, located in Kings County, approximately 170 miles northwest of the Project Site. The facility is permitted to accept most types of hazardous wastes as defined by the U.S. Environmental Protection Agency and State of California. Materials accepted at the Kettleman Hills Facility include asbestos debris, lead-based paint (LBP) materials, polychlorinated biphenyls (PCBs), petroleum-contaminated soils and debris, soils and debris with metal contamination, household hazardous wastes from collection events, baghouse dusts, various ash waste, filter cake, catalyst solids, latex paint, groundwater, stormwater, clarifier water, and various sludges.<sup>87</sup>

(d) *City of Los Angeles Hazardous Waste Disposal Programs*

LA Sanitation has established seven permanent waste collection sites throughout the City known as S.A.F.E. (solvents/automotive/flammables/electronics) Centers, which are open every weekend to allow residents and business to conveniently dispose to their household hazardous waste. These S.A.F.E. centers generally accept used motor oil and filters; paint and solvents; e-waste, such as computers, cell phones and televisions; household cleaning products; car and household batteries; fluorescent tubes and bulbs;

<sup>84</sup> Azusa Land Reclamation Fact Sheet, prepared by Waste Management, 2014, [https://www.wmsolutions.com/pdf/factsheet/Azusa\\_Land\\_Reclamation.pdf](https://www.wmsolutions.com/pdf/factsheet/Azusa_Land_Reclamation.pdf), accessed November 2015.

<sup>85</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, page 33, prepared by County of Los Angeles Department of Public Works, dated December 2016.

<sup>86</sup> Ibid, page 51.

<sup>87</sup> Waste Management. Website, Facility Overview: Kettleman Hills. Available at: <http://kettlemanhillslandfill.wm.com/fact-sheets/2011/facility-overview.jsp>, accessed August 2019.

home generated sharps, such as needles and lancets; and unused medicine (except controlled substances).<sup>88</sup> To facilitate disposal of household hazardous waste throughout the City, LA Sanitation also provides Mobile Collection Events in areas not served by the S.A.F.E Centers. In addition, Calrecycle has certified used motor oil collection centers throughout the state. These locations accept uncontaminated oil throughout the year.

(e) *City Recycling Programs*

As discussed above in the regulatory discussion, the City of Los Angeles has numerous plans, policies and regulations that address the future provision of solid waste services and reductions of the solid waste stream. LA Sanitation's Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and composting programs in the City. The Solid Resources Citywide Recycling Division provides technical assistance to public and private recyclers, oversees the City's recycling program, manages the Household Hazardous Waste program, and helps create markets for recyclable materials. The Solid Resources Citywide Recycling Division also provides information to public and private sectors regarding construction waste diversion through the publication of the Construction and Demolition Recycling Guide, which is a directory of recyclers and certified mixed-debris processors that serve the greater Los Angeles area. In addition to an alphabetical listing of companies, the Construction and Demolition Recycling Guide also provides listings by materials accepted (i.e., wood waste, scrap metal, drywall, etc.) so that developers and contractors can tailor their recycling choices to suit different project needs.

In 2001, the City of Los Angeles adopted a 70 percent diversion rate goal by 2020. During his term, 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.<sup>89</sup> According to LA Sanitation, the City has achieved a landfill diversion rate of 76.4 percent.<sup>90</sup>

<sup>88</sup> LA Sanitation website, Hazardous Waste S.A.F.E Centers and Mobil Collection Events, S.A.F.E. Center, [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-hw/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?\\_afLoop=10609608550181567&\\_afWindowMode=0&\\_afWindowId=1d8i26cnvc&\\_adf.ctrl-state=g402ecklk\\_1774#!%40%40%3F\\_afWindowId%3D1d8i26cnvc%26\\_afLoop%3D10609608550181567%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dg402ecklk\\_1778](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-hw/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afLoop=10609608550181567&_afWindowMode=0&_afWindowId=1d8i26cnvc&_adf.ctrl-state=g402ecklk_1774#!%40%40%3F_afWindowId%3D1d8i26cnvc%26_afLoop%3D10609608550181567%26_afWindowMode%3D0%26_adf.ctrl-state%3Dg402ecklk_1778), Accessed August 2019.

<sup>89</sup> City of Los Angeles, Zero Waste Progress Report, March 2013. Available at: [https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04\\_Zero%20Waste%20Progress%20Report\\_March%202013.pdf](https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf). Accessed August 2019.

<sup>90</sup> City of Los Angeles Sanitation website, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?\\_afLoop=10612365830083093&\\_afWindowMode=0&\\_afWindowId=18dr61h0pb&\\_adf.ctrl-state=g402ecklk\\_1912#!%40%40%3F\\_afWindowId%3D18dr61h0pb%26\\_afLoop%3D10612365830083093%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dg402ecklk\\_1916](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afLoop=10612365830083093&_afWindowMode=0&_afWindowId=18dr61h0pb&_adf.ctrl-state=g402ecklk_1912#!%40%40%3F_afWindowId%3D18dr61h0pb%26_afLoop%3D10612365830083093%26_afWindowMode%3D0%26_adf.ctrl-state%3Dg402ecklk_1916), accessed August 2019.

### 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 utilities and service systems if it would:

***Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or***

***Threshold (b): Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.***

***Threshold (c): Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, or***

***Threshold (d): Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, or***

***Threshold (e): Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.***

In assessing the Project's potential impacts related to utilities and services systems, including water/water supply, wastewater, and solid waste in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance, identified above.

The factors below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will also be used where applicable and relevant to assist in analyzing the Appendix G questions:

#### **Water**

- 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.

### **Wastewater**

- 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.

### **Solid Waste**

- Amount of projected 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; and
- 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**

### **(1) Potable Water Use**

As discussed above, the Project is not subject to the requirements of SB 610, because it neither includes the development of 500 residential units or retail floor area in excess of 500,000 square feet nor would it generate a water demand equivalent to or greater than that required by a 500 dwelling unit project. In addition, the Project is not subject to the requirements of SB 221 because it is located within an urbanized area it does not propose the development of 500 or more dwelling units, and it is an urban infill project exempted from the requirements of the statutes. Therefore, neither a WSA nor a WSV is required to demonstrate LADWP's ability to meet the Project's projected water demand.

LADWP's available water supply to serve the Project was determined based on the information in LADWP's 2015 UWMP. LADWP's 2015 UWMP does not provide water consumption factors based on land use (e.g., residential, commercial, industrial, etc.). Rather, projected future water use is based on overall growth trends in LADWP's service area. However, in order to complete a water supply analysis, water consumption factors based on land use were necessary. Therefore, water consumption estimates were developed for long-term operational use based on the City's wastewater generation

factors contained in the Request for WWSI and based on the City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012. To be conservative, 20 percent was added to the total usage based on these factors to account for outdoor water use.

Accordingly, the daily existing and projected water demand was calculated based on the wastewater generation times 1.2 (or 120 percent). That figure was converted to annual demand in acre-feet by multiplying the water demand times 365 (days in the year) and dividing the result by the factor of 325,851, which is the number of gallons in one acre-foot of water. The existing water demand for the current on-site uses was subtracted from the projected water demand for the Project to determine the net increase in water demand that would result from Project development. Because daily water demand fluctuates for some land uses depending on the season and other factors, annual average demand presents a far more stable and accurate assessment of total annual demand. The analysis of potential impacts to water supply was based on the net increase in demand resulting from the Project relative to the existing water supply.

The analysis assesses whether the Project's anticipated domestic water demand would be accommodated by the existing water infrastructure, and whether LADWP has sufficient long-term water supplies to serve the Project. Impacts regarding water demand and supply relative to fire-fighting are addressed in Section IV.K-1, *Fire Protection and Emergency Medical Services*, of this Draft EIR.

## (2) Wastewater

All wastewater generation in this analysis was determined using wastewater generation factors obtained from the Request for WWSI correspondence via the City's Wastewater Engineering Services Division, which are based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.<sup>91</sup> First, the amount of wastewater generated from the existing uses on the Project Site was determined based on these factors. The same factors were used to determine the amount of wastewater that would be generated by the proposed uses that make up the Project. The amount of wastewater generated by existing uses was subtracted from the Project's wastewater generation to determine the net increase in wastewater that would occur at the Project Site as a result of the Project. The Project's estimated increase in wastewater flow was then assessed against the available capacity of the existing sewer system to determine the ability of the system to accommodate the net increase in wastewater flows that would be created by the Project. In order to evaluate treatment capacity, the Project's estimated wastewater generation and projected average wastewater flow were compared to the available treatment capacity within the HWRP. Cumulative wastewater generation was

<sup>91</sup> City of Los Angeles, L.A. CEQA Thresholds Guides, page M.2-22 through M.2-26, 2006.

compared to the available capacity of the Hyperion Service Area using the average daily cumulative wastewater generation flow from the related projects plus the Project.

### (3) Solid Waste

The solid waste analysis addresses the amount of solid waste that would be generated by the Project during both construction and operations, and whether sufficient landfill capacity is available to accommodate the projected volumes of waste. The existing and projected amount of solid waste generated is determined by using a per unit waste generation factor for the various uses, which are derived from relevant guidance documents from CalRecycle and the United States Environmental Protection Agency (EPA). The amount of solid waste currently generated by the uses on the Project Site is subtracted from the projected amount of solid waste to determine the net increase in waste that would be caused by the Project. The analysis accounts for Citywide diversion rates applied to the projected waste generation. The availability of landfill capacity is taken directly from the CoLWMP 2015 Annual Report; refer to Table IV.N.1-6. The Project's net increase in waste is compared to existing and planned capacities to determine the Project's potential impact. The analysis also addressed the Project's consistency with applicable federal, State, and local statutes and regulations related to solid waste.

The analysis for cumulative impacts determines the collective amount of solid waste that would be generated by the 137 related projects within the Project Site vicinity that would contribute to the demand for solid waste disposal, which are identified in Chapter III, *General Description of Environmental Setting*, of this Draft EIR. This analysis utilizes the same waste generation factors used to determine the waste generation from the Project, which are based on the uses proposed for the related projects and derived from relevant governmental guidance documents. This projected cumulative increase in solid waste production is then compared with the current and projected landfill capacity at available landfill and solid waste storage facilities to determine whether cumulatively significant or cumulatively considerable impacts would occur.

### c) Project Design Features

The following Project Design Feature is incorporated into the Project and would reduce the Project's total water demand:

**PDF WS-1:** Water conservation measures will include, but not be limited to: installation of waterless urinals; 1.75 gpm for shower heads; high efficient/demand water heater system; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible.

## d) Analysis of Project Impacts

***Threshold (a): Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*<sup>92</sup>**

### (1) Water

#### (a) Construction

As discussed below, the existing LADWP water infrastructure would be adequate to provide for the water flow necessary to serve the Project during operation. Thus, no upgrades to the water mains that serve the Project Site would be required. However, the Project would require new service connections to connect to the existing water mainlines adjacent to the Project Site, including the installation of a new six-inch metered water service connection to the existing eight-inch water main along Argyle Avenue to serve the Project. The design and installation of the new service connections would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface, and minor off-site work to connect to the existing public water mains. The limited off-site connection activities could temporarily affect access in adjacent public right-of-ways. However, as discussed in Section IV.L, *Transportation*, a Construction Management Plan is incorporated into the Project and would be implemented during Project construction pursuant to PDF TRAF-1, to ensure that adequate and safe access would remain available within and near the Project Site during any such construction activities. The work site traffic control plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways, as necessary. In addition, prior to conducting any ground disturbing activities, Project contractors must coordinate with LADWP to identify the locations and depths of existing water lines in the Project Site vicinity to avoid any unintended disruption of water service.

Overall, construction activities associated with the Project would not require or result in the construction of new water facilities or the expansion of existing facilities that could have a significant impact on the environment. In addition, the existing water distribution capacity would be adequate to serve the Project. Furthermore, as discussed above, minor off-site construction impacts associated with the installation of the new service

<sup>92</sup> The analysis of electricity and natural gas infrastructure is provided in Section IV.N-2, *Utilities and Service Systems – Energy Infrastructure*; the analysis of stormwater drainage is evaluated in Section IV.G, *Hydrology and Water Quality*; and the evaluation of telecommunications infrastructure is evaluated in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

connections would be temporary in nature and would not result in a substantial interruption in water service or material inconvenience to motorists or pedestrians. **Therefore, Project construction activities would not require the construction or relocation of water supply infrastructure resulting in significant environmental effects. Impacts regarding water infrastructure would be less than significant.**

(b) *Operation*

The existing water infrastructure serving the Project Site consists of water mains located underneath adjacent City streets. The local distribution network varies from four-inch to 12-inch pipe diameters and includes a 12-inch pipe beneath West Yucca Street; an eight-inch pipe beneath Argyle Avenue; and a four-inch pipe beneath Vista Del Mar Avenue.<sup>93</sup> The Project applicant would be responsible for providing the necessary water infrastructure within the Project Site and any lateral lines needed to connect the Project Site to existing water lines in the area. The Project would provide on-site infrastructure including pumps as needed, and pipe sizing to maintain appropriate water flows and pressure levels. Specifically, the Project would install two new metered water service connections (four-inch and six-inch connections) to the existing eight-inch water main along Argyle Avenue, in addition to a two-inch water meter connection to the existing four-inch water main in Vista Del Mar. Per the Project's SAR report, there would be a total flow of 700 gpm in the proposed water service connections.<sup>94</sup> While the peak hour demand for the Project would be 140 gpm (see Table IV.N.1-8), the instantaneous demand of the combined six-inch, four-inch and two-inch meters would be 862 gpm based on a water supply fixture count for the Project.<sup>95</sup> The SAR indicates that there would be 1,400 gpm fire flow with simultaneous 700 gpm domestic flow (a total of 2,100 gpm) at 47 psi available to the Project Site. A minimum residual water pressure of 20 psi is required for fire-fighting purposes. **The system would have available capacity to meet the domestic water needs of the Project, including for firefighting services, and, as such, Project operation would not require the construction or relocation of water supply infrastructure resulting in significant environmental effects. Impacts regarding water infrastructure would be less than significant.**

(2) Wastewater

(a) *Construction*

During construction of the Project, a negligible amount of wastewater in comparison to Project operation would be generated by construction workers. It is anticipated and customary that portable toilets would be provided by a licensed private vendor that would dispose of the construction-generated wastewater off-site. Such wastewater

<sup>93</sup> Water System and Supply Report for the 6220 West Yucca, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. (Appendix N to this Draft EIR)

<sup>94</sup> City of Los Angeles Department of Water and Power – Water System, Fire Service Pressure Flow Report, SAR Number 58424, approved date February 22, 2017.

<sup>95</sup> See Appendix III for the fixture count table in the Water System and Supply Report for the 6220 West Yucca, prepared by Southland Civil Engineering & Survey, LLP, dated November 3, 2017. (Appendix N to this Draft EIR)



generation is therefore anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems and 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, the wastewater generated by construction workers. The minimal wastewater generation during construction would not require the construction of new facilities or expansion of existing facilities, and, given their small amount and is 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 City of Los Angeles Public Works (LADPW), Bureau of Engineering (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 of Los Angeles Building and Safety Code and LADWP requirements. All necessary wastewater system improvements would be verified through the permit approval process for obtaining a sewer connection permit from the City. **Therefore, based on these factors, construction activities would result in no or negligible impacts to local wastewater conveyance and treatment systems from wastewater generation, and construction impacts related to installing lines would be limited and temporary in nature. Therefore, Project construction activities would not require the construction or relocation of wastewater infrastructure resulting in significant environmental effects. Impacts regarding wastewater infrastructure would be less than significant.**

*(b) Operation*

The Project Site would continue to be served by existing City sewer and utility lines. As reported in **Table IV.N.1-7, Wastewater Generated During Operation**, the Project would result in an estimated total average wastewater flow of approximately 69,075 gpd or 0.107 cfs, and a peak wastewater flow of 0.353 cfs. However, subtracting the existing site's generation of 6,080 gpd or 0.009 cfs, and a peak wastewater flow of 0.031 cfs, the Project would result in a net increase of 62,995 gpd of average wastewater flow or 0.097 cfs and a peak wastewater flow of 0.322 over existing conditions during dry weather conditions.

**TABLE IV.N.1-7  
WASTEWATER GENERATED DURING OPERATION**

<b>Land Use</b>	<b>Quantity (units/sf)</b>	<b>Generation Factor<sup>a</sup></b>	<b>Average Wastewater Flow (gpd)</b>	<b>Average Wastewater Flow (cfs)</b>	<b>Peak Wastewater Flow (cfs)</b>
<b>Existing Uses</b>					
Residential Single-Family	1 unit	185 gpd/du	185	0.000	0.001
Residential Multi-Family	2 units	150 gpd/du	300	0.000	0.002
Residential: Apartment – Bachelor	1 unit	75 gpd/du	75	0.0001	0.0004
Residential: Apartment 1-Bedroom	26 units	110 gpd/du	2,860	0.004	0.015
Residential: Apartment 2-Bedroom	14 units	150 gpd/du	2,100	0.003	0.011
Parking/Asphalt/Hardscape Areas <sup>b</sup>	28,000 s.f.	20 gpd/1,000 s.f.	560	0.001	0.003
<b>Total</b>			<b>6,080</b>	<b>0.009</b>	<b>0.031</b>
<b>PROPOSED USES</b>					
Residential: Apartment – 1 Bedroom	104 units	110 gpd/du	11,440	0.018	0.058
Residential: Apartment – 2 Bedroom	96 units	150 gpd/du	14,400	0.022	0.074
Residential: Apartment – 3 Bedroom	10 units	190 gpd/du	1,900	0.003	0.010
Hotel	156 rooms <sup>c</sup>	120 gpd/room	18,720	0.029	0.096
Restaurant	500 seats <sup>d</sup>	30 gpd/seat	15,000	0.023	0.077
Retail Area	3,450 s.f. <sup>e</sup>	25 gpd/1,000 s.f.	86	0.000	0.000
Bar (cocktail, public table area)	920 s.f.	720 gpd/1,000 s.f.	662	0.001	0.003
Spa (health club, includes gym)	3,850 s.f.	650 gpd/1,000 s.f.	2,503	0.004	0.013
Meeting Space	4,600 s.f.	120 gpd/1,000 s.f.	552	0.001	0.003
Parking Structure	190,605 s.f.	20 gpd/1,000 s.f.	3,812	0.006	0.019
<b>Total</b>			<b>69,075</b>	<b>0.107</b>	<b>0.353</b>
<b>Net Increase (Proposed – Existing)</b>			<b>62,995</b>	<b>0.097</b>	<b>0.322</b>

NOTE: du = dwelling unit; s.f. = square feet; gpd = gallons per day;

- <sup>a</sup> Wastewater generation factors obtained from the *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.
- <sup>b</sup> 18,000 square feet of parking/asphalt area and 10,000 square feet of hardscape area.
- <sup>c</sup> 116 hotel rooms + 20 hotel suites = 136 hotel rooms. Per the *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017, hotel suites = 2 rooms. 20 hotel suites = 40 rooms. 116 hotel rooms + 40 rooms = 156 total rooms.
- <sup>d</sup> Indoor restaurant (X3, total 9,120 s.f. plus 4<sup>th</sup> level outdoor seating).
- <sup>e</sup> Retail less than 100,000 s.f. (commercial).

SOURCE: 6220 W. Yucca Street Mixed Use Development – Wastewater Revision, prepared by Southland Civil Engineering & Survey, LLP, dated November 2, 2017. (Appendix N to this Draft EIR)

As discussed above under Existing Conditions, eight-inch sewer main lines in Argyle and Vista Del Mar serve the Project Site. The sewer line in Vista Del Mar traverses to Argyle south of the Project Site and all flow is concentrated in Argyle before reaching Hollywood Boulevard, the next street south. There are two existing six-inch laterals in Argyle and two existing six-inch laterals in Vista Del Mar.

It is likely that the majority of the Project flow will be discharged to Argyle with a possible 80/20 split with Vista Del Mar. The existing laterals are all six-inches and are expected to be adequate for the flows expected, with up to nine (9) additional laterals potentially being required for the Project.<sup>96</sup>

The Project Site is located near the most upstream ends of the existing sewer mains in both Argyle, and Vista Del Mar. At Argyle, the Project Site is the first connection to the main, and no other upstream flow is expected. At Vista Del Mar, the sewer main built in 1916 stops at the property frontage. A new extension to that line was built in 1944 by the City for apparent maintenance purposes to join the manhole located at Vista Del Mar and Yucca. The only offsite flow contributing to this point may be from the property at 6201 Yucca and would have been accounted for in the provided WWSI as current flow.<sup>97</sup>

The existing mains in both Argyle and Vista Del Mar are considered relatively steep and, as discussed below, do not pose a concern regarding flow capacity. Per the WWSI, the eight-inch main in Argyle has greater capacity than the downstream eight-inch main in Sunset Boulevard while having less flow. The larger sewer main pipes in Vine, downstream of the Sunset Boulevard main contain capacity in the order of millions of gallons per day, and do not pose a concern regarding flow capacity. Therefore, the eight-

<sup>96</sup> 6220 W. Yucca Street Mixed Use Development – Wastewater Revision, prepared by Southland Civil Engineering & Survey, LLP, dated November 2, 2017. (Appendix N to this Draft EIR)

<sup>97</sup> 6220 W. Yucca Street Mixed Use Development – Wastewater Revision, prepared by Southland Civil Engineering & Survey, LLP, dated November 2, 2017. (Appendix N to this Draft EIR)

inch main in Sunset Boulevard is a key line for determining whether the local system has adequate capacity to serve the Project.

The eight-inch main in Sunset Boulevard is metered, and per the WWSI, has a design flow capacity of 229,323 gpd (equal to 0.355 cfs) and per as-built plans, has a slope of 0.04 percent. Per Manning's formula for open channel flow, the material "n" value (the only unknown variable) can be derived and equals 0.014.<sup>98</sup> The flow in the pipe is metered at 41 percent d/D (depth of flow to pipe diameter ratio) per the WWSI. Per Manning's formula for open channel flow, the existing flow can be derived to be 0.254 cfs at the metered depth.

The Project proposes a net increase in peak wastewater flow of 0.322 cfs. The City Sewer Design Manual section on Trigger Flow (included as attachment to the Wastewater Technical Study included in Appendix N of this EIR) states the following:

- "The trigger flow in a sanitary sewer is the quantity of flow that, once reached, would initiate the planning for a relief or replacement sewer."
- "The time required to complete a new sewer relief or replacement project is at least five years."
- "Currently, hydraulic relief is needed when the depth of flow reaches three fourths of the pipe diameter."<sup>99</sup>

In order to evaluate the potential of trigger flow at the eight-inch main in Sunset Boulevard, the net increase in flow from the Project is added to the estimated five-year increase in current metered flow. The Wastewater Technical Study indicates the projected five-year increase of 0.0408 applied to the current flow of 0.254 cfs in the Sunset Boulevard main yields a flow of 0.264 cfs. Adding the peak flow from the Project of 0.322 cfs, results in a projected total flow of 0.586 cfs, which per Manning's formula, results in a flow depth to pipe diameter ratio of 0.69, which is less than the 0.75 "trigger flow."<sup>100</sup> Therefore, the Project would not generate a trigger flow when added to the projected five-year growth.

Construction of on-site wastewater infrastructure and connections to local sewer lines would be subject to multiple layers of review and inspection by the City, including at the plan check phase and prior to the issuance of any required discharge permits. Such onsite infrastructure may include a clean out structure and/or a sewer trap satisfactory to the City Department of Building and Safety. Construction of any new laterals would be required to satisfy plumbing code requirements and LASAN and BOE requirements. Furthermore, in accordance with LAMC Sections 64.11 and 64.12, the Project would pay

<sup>98</sup> The Manning's equation is an empirical equation that applies to uniform flow in open channels and is a function of the channel velocity, flow area and channel slope. See <https://www.h2ometrics.com/manning-equation/>. Accessed August 2019.

<sup>99</sup> City of Los Angeles, Bureau of Engineering, Sewer Design Manual, Part F, June 1992. Available at: <http://eng2.lacity.org/techdocs/sewer-ma/f100.pdf>. Accessed September 2019.

<sup>100</sup> 6220 W. Yucca Street Mixed Use Development – Wastewater Revision, prepared by Southland Civil Engineering & Survey, LLP, dated November 2, 2017. (Appendix N to this Draft EIR)

the required sewer connection fees to offset the Project's contribution to the City's wastewater collection and treatment infrastructure needs.

As discussed above, the Project's wastewater would ultimately be treated at the HWRP. Regarding treatment capacity, the HWRP has a total remaining capacity of 175 mgd. The Project would result in a net average wastewater flow of 62,995 gpd. This would represent approximately 0.04 percent of the HWRP's total remaining capacity of 175 mgd. Given the amount of wastewater generated by the Project and the existing wastewater treatment capacity at the HWRP, adequate wastewater treatment capacity would be available to serve the Project.

Furthermore, the City provides continuous monitoring of its wastewater conveyance systems, and upgrades its systems as needed to ensure it retains sufficient capacity.<sup>101</sup> As part of these efforts, the City can also require development to fund system upgrades and improvements where sufficient capacity is not available to meet demand. Additional review of the Project would be required by the BOE at the time of Project construction to verify available capacity and to impose any necessary Project requirements, if warranted, to address the status of existing capacity at the time the Project is constructed. The process to date, as reflected in the Request for WWSI, and reconfirmation of the adequacy of capacity by the BOE prior to construction, would ensure that adequate system conveyance capacity for Project operations is available prior to construction, confirming the conclusions of this analysis. **Therefore, Project operation would not require the construction or relocation of wastewater infrastructure resulting in significant environmental effects. Impacts regarding wastewater infrastructure would be 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?***

### (1) Construction

The Project would create a short-term demand for water for construction purposes would occur during demolition, excavation, grading, and construction activities that would occur on-site. These activities would occur incrementally over time from the start of construction to occupancy of the Project and would be temporary in nature, with the greatest demand occurring during site preparation and grading. The activities that would generate the demand for water supplies during construction include soil watering for fugitive dust control, clean up, masonry, painting, and other activities that would be temporary and intermittent. The demand for water during demolition, excavation, grading and construction activities is assumed to be similar to landscape irrigation demand, or approximately 3,000 gallons per

<sup>101</sup> The City provides needed upgrades to its wastewater system through its Wastewater Capital Improvement Program, see <https://www.lacitysan.org/san/sandocview?docname=cnt020368>, accessed August 2019.

acre per day.<sup>102</sup> The water demand generated by Project construction activities would be offset by the reduction in water consumption from the cessation of the existing uses prior to demolition activities. Specifically, the existing uses currently consume approximately 7,296 gpd or approximately 8.17 AFY (see Table IV.N.1-8 for a detailed breakdown), while construction-related water use on a 1.19-acre site would be approximately 3,570 gpd based on the factor of 3,000 gallons per acre per day. Thus, the construction usage would be less than is currently used for onsite operations of the existing uses, and construction use is therefore considered less than significant on this basis for any water year scenario, including multiple dry years. Furthermore, the water demand during construction activities would be less than the net new water demand of the Project at buildout. As discussed below for the Project operations, as concluded in LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during the average year, single-dry year, and multiple dry-year in each year from 2015 to 2040, which assumptions include growth projections that would include the Project's net increase in water usage. Project construction would commence in 2019, with construction activities occurring for approximately two years. Full build-out and occupancy would occur in 2022. **Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction under normal and dry year scenarios. Therefore, impacts to water supply during construction activities would be less than significant.**

## (2) Operation

**Table IV.N.1-8, *Estimated Domestic Water Demand for Project***, presents the breakdown of the proposed land uses that make up the Project and their corresponding estimated water demand. Development of the Project would result in an increase in long-term water demand for operational uses, maintenance, and other activities on the Project Site. The Project is estimated to result in a net increase of 59,931 gpd or 67.13 AFY of water after accounting for the water demand of the existing uses on-site (7,296 gpd or 8.17 AFY). The estimates presented in Table IV.N.1-8 take into consideration the water conservation measures that will be implemented by the Project, which will reduce the estimated demand by approximately 20 percent. As provided in PDF-WS-1, water conservation incorporated into the Project include installation of waterless urinals; low flow shower heads that use 1.75 gpm; a high efficiency water heater system; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf instead of grass, where feasible.

<sup>102</sup> Estimated landscape irrigation is based on a factor of 20.94 gallons per year per square foot of landscaped area within the Los Angeles area (Mediterranean climate), which assumes high water demand landscaping materials and an irrigation system efficiency of 85% (high efficiency). Factor is therefore  $(20.94 \text{ GAL/SF./year}) \times (43,560 \text{ SF/acre}) / (365 \text{ days/year}) / (0.85) = 2,940 \text{ gallons/acre/day}$ , rounded up to 3,000 gallons/acre/day. Source: U.S. Department of Energy, Energy Efficiency & Renewable Energy, Federal Energy Management Program. "Guidelines for Estimating Unmetered Landscaping Water Use." July 2010. Page 12, Table 4 - Annual Irrigation Factor – Landscaped Areas with High Water Requirements. Available at: [https://www.energy.gov/sites/prod/files/2013/10/f3/est\\_unmetered\\_landscape\\_wtr.pdf](https://www.energy.gov/sites/prod/files/2013/10/f3/est_unmetered_landscape_wtr.pdf). Accessed September 2019.

**TABLE IV.N.1-8  
ESTIMATED DOMESTIC WATER DEMAND FOR PROJECT**

Land Use	Quantity	Factor (gpd) <sup>a</sup>	Wastewater Generation (gpd)	Daily Water Demand (gpd) <sup>b</sup>	Avg. Daily Demand ADD (gpm)	Peak Hour Demand PHD (gpm) = 3 X ADD	Annual Water Demand (AFY) <sup>c</sup>
<b>Existing Uses</b>							
Residential Single-Family	1 unit	185 gpd/du	185	222	0.15	0.4 <sup>d</sup>	0.25
Residential Multi-Family	2 units	150 gpd/du	300	360	0.25	0.7 <sup>d</sup>	0.40
Residential: Apartment – Bachelor	1 unit	75 gpd/du	75	90	0.06	0.1 <sup>d</sup>	0.10
Residential: Apartment 1-Bedroom	26 units	110 gpd/du	2,860	3,432	2.38	7.1 <sup>d</sup>	3.85
Residential: Apartment 2-Bedroom	14 units	150 gpd/du	2,100	2,520	1.75	5.2 <sup>d</sup>	2.82
Parking/Asphalt/Hardscape Areas <sup>d</sup>	28,000 s.f.	20 gpd/1,000 s.f.	560	672	0.47	1.4 <sup>d</sup>	0.75
<b>Total</b>			<b>6,080</b>	<b>7,296</b>	<b>5</b>	<b>1<sup>d</sup></b>	<b>8.17</b>
<b>Proposed Uses</b>							
Residential: Apartment – 1 Bedroom	104 units	110 gpd/du	11,440	13,728	9.53	28.6 <sup>d</sup>	15.38
Residential: Apartment – 2 Bedroom	96 units	150 gpd/du	14,400	17,280	12.00	36.0 <sup>d</sup>	19.36
Residential: Apartment – 3 Bedroom	10 units	190 gpd/du	1,900	2,280	1.58	4.7 <sup>d</sup>	2.55
Hotel	156rooms <sup>e</sup>	120 gpd/room	18,720	22,464	15.60	46.8 <sup>d</sup>	25.16
Restaurant	500 seats <sup>f</sup>	30 gpd/seat	15,000	18,000	12.50	37.5 <sup>d</sup>	20.16
Retail Area	3,450 s.f. <sup>g</sup>	25 gpd/1,000	86	104	0.07	0.2 <sup>d</sup>	0.12
Bar (cocktail, public table area)	920 s.f.	720 gpd/1,000 sf	662	795	0.55	1.6 <sup>d</sup>	0.89
Spa (health club, includes gym)	3,850 s.f.	650 gpd/1,000 s.f.	2,503	3,003	2.09	6.2 <sup>d</sup>	3.36
Meeting Space	4,600 s.f.	120 gpd/1,000 s.f.	552	662	0.46	1.3 <sup>d</sup>	0.74
Parking Structure	190,605 s.f.	20 gpd/1,000 s.f.	3,812	4,575	3.18	9.5 <sup>d</sup>	5.12
<b>Subtotal</b>			<b>69,075</b>	<b>82,890</b>	<b>57.56</b>	<b>172.6</b>	<b>92.85</b>
Less Additional Conservation (20%) <sup>h</sup>				-15,663	-10.88	-32.6	-17.54
<b>Total</b>				<b>67,227</b>	<b>46.69</b>	<b>140.0</b>	<b>75.30</b>

Land Use	Quantity	Factor (gpd) <sup>a</sup>	Wastewater Generation (gpd)	Daily Water Demand (gpd) <sup>b</sup>	Avg. Daily Demand ADD (gpm)	Peak Hour Demand PHD (gpm) = 3 X ADD	Annual Water Demand (AFY) <sup>c</sup>
<b>Net Increase (Proposed – Existing)</b>			<b>62,995</b>	<b>59,931</b>	<b>42</b>	<b>12</b>	<b>67.13</b>

NOTE: DU. = dwelling unit; SF = square feet; gpm = gallons per minute; gpd = gallons per day; AFY = acre feet per year.

a Wastewater generation factors obtained from *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.

b Water demand is consistent with wastewater generation. To be conservative, 20 percent was added to account for outdoor water use.

c An acre-foot equals approximately 325,851 gallons

d 18,000 square feet of parking/asphalt area and 10,000 square feet of hardscape area.

e 116 hotel rooms + 20 hotel suites = 136 hotel rooms. Per the *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017, hotel suites = 2 rooms. 20 hotel suites = 40 rooms. 116 hotel rooms + 40 rooms = 156 total rooms.

f Indoor restaurant (X3, total 9,120 s.f. plus 4<sup>th</sup> level outdoor seating).

g Retail less than 100,000 SF (commercial).

h Estimated 20 percent water use reduction due to additional water conservation commitments agreed by the Project applicant: installation of waterless urinals; 1.75 gpm for shower heads; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible. The parking structure is excluded from this reduction as water conservation measures do not apply.

SOURCE: *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and ESA, 2019

LADWP's 2015 UWMP provides water demand projections in five-year increments through 2040, which are based on demographic data from SCAG's 2012 Regional Transportation Plan, as well as billing data for each major customer class and weather, and conservation data. **Table IV.N.1-9 Water Demand Forecast Through 2040**, shows the projected water demand for the City of Los Angeles through 2040 taken from the LADWP's 2015 UWMP. As shown in Table IV.N.1-9, the City's water demand is estimated to reach 675,685 AFY by 2040, which is an increase of 63,870 AFY, or approximately 9.5 percent, from the 2020 consumption of 611,815 AFY. Table IV.N.1-9 also shows the Mayor's Sustainable City pLAn target goals, pursuant to which the City's water demand is expected to reach 565,600 AFY by 2040, which is an increase of 80,000 AFY, or approximately 14 percent, from the 2020 485,600 AFY. The net increase in water demand from the Project of 67.13 AFY constitutes approximately 0.11 percent of the City's estimated total increase of 63,870 AFY in water demand through 2040. Per the Mayor's Sustainable City pLAn, the 67.13 AFY net increase from the Project constitutes approximately 0.08 percent of the City's total increase of 80,000 AFY in water demand through 2040 if the pLAn target use is met.



**TABLE IV.N.1-9**  
**WATER DEMAND FORECAST THROUGH 2040 (IN ACRE-FEET PER YEAR)**

Fiscal Year Ending	Water Demands by Sector (Acre-Feet)						Planned Target Use <sup>a</sup>
	Single-Family	Multi-Family	Commercial/Government	Industrial	Non-Revenue	Total	
2020	222,958	184,679	148,600	18,869	36,709	611,815	485,600
2025	224,729	206,065	155,994	19,235	38,682	644,706	533,000
2030	226,770	211,454	156,788	18,701	39,173	652,886	540,100
2035	231,776	216,071	156,186	18,104	39,711	661,848	551,100
2040	231,767	225,994	159,554	17,829	40,541	675,685	565,600

<sup>a</sup> Targeted water demands set forth in the Mayor's Sustainable City pLAN.

SOURCE: Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit 2L.

As discussed in the water reliability section of LADWP's 2015 UWMP,<sup>103</sup> LADWP expects to have a reliable supply of up to 642,400 AF for single dry year and multiple dry years and 611,800 AF for an average weather year in 2020; 676,900 AF for single dry year and multi-dry years and 644,700 AF for an average weather year in 2025; and 709,500 AF for single dry year and multi-dry years and 675,700 AF for an average weather year in 2040. These projections reflect the average annual hydrological conditions based on the years 1922 through 2012 where drought response strategies are not in effect. The UWMP estimates demands of 611,815 AF in 2020; 644,706 AF in 2025; and 675,685 AF in 2040. The estimated demands would result in a surplus of 30,585 AF for single dry year and multi-dry years and a shortage of 15 AF for an average weather year in 2020. For 2025, the demand would result in a surplus of 32,194 AF for single dry year and multi-dry years and a shortage of 6 AF for an average weather year. For 2040, the demand would result in a surplus of 33,815 AF for single dry year and multi-dry years and a surplus of 15 AF for an average weather year. If the targeted water demand reductions in the Mayor's Sustainable City pLAN are met, then LADWP's demand projections of 485,600 AF in 2020 would result in a surplus of 156,800 AF for single dry year and multi-dry years and a surplus of 126,200 AF for an average weather year. For 2025, if the pLAN is met, then LADWP's demand projections of 533,000 AF would result in a surplus of 143,900 AF for single dry year and multi-dry years and a surplus of 111,700 AF for an average weather year. If the pLAN was met in 2040, then LADWP's demand projections of 565,600 AF would result in a surplus of 143,900 AF for single dry year and multi-dry years and a surplus of 110,100 AF for an average weather year. Based on LADWP's projected surpluses, LADWP will be able to meet the water demand of the Project in 2020, 2025, and 2040 with more than sufficient margin for error.

<sup>103</sup> Los Angeles Department of Water & Power, 2015 Urban Water Management Plan, Exhibits 11F, G, and H. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M217.pdf>. Accessed September 2019.

As occurred during the most recent drought from 2011-2016, during times of severe water shortages, when MWD reduces allocations of imported water, LADWP and its customers demonstrated the ability to reduce consumption through the implementation of use restrictions under the City's Emergency Water Conservation Plan Ordinance, achieving a 20percent reduction in potable water usage.<sup>104</sup> Furthermore, as stated previously, the analysis in MWD's 2015 UWMP and the MWD's IRP 2015 Update indicate that reliable water sources will be available to continuously meet the City's expected demands through 2040 under single dry-year, multiple dry-year, and average weather year hydrologic conditions.

The Project would also meet its obligation to support LADWP's efforts to reduce potable water consumption by incorporating water conservation features that meet and exceed State and local requirements for water conservation through the implementation of PDF WS-1. **The Project would be consistent with required City ordinances including mandatory and voluntary efforts to reduce potable water consumption, which efforts will be confirmed during site-plan review for the Project and would contribute to conservation goals established in the adopted LADWP and MWD UWMPs. Given that LADWP would be able to meet the water demand generated by the Project in single year and multi-year normal and drought year scenarios, impacts associated with long-term operation of the Project on water supply would be less than significant.**

***Threshold (c): Would the project result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

As discussed under Threshold a, the HWRP would have adequate capacity to treat wastewater generated by the Project. In addition, as analyzed therein, the City's existing sewer system has adequate capacity to accommodate the anticipated wastewater generated by the Project. Moreover, the Project would be required to construct or otherwise implement any system upgrades that may be necessary to meet its demand, if necessary, as to be finally determined by the City when the Project seeks building permits. **Therefore, LASAN through its existing sewer infrastructure system and HWRP have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Less than significant impacts would occur in this regard.**

<sup>104</sup> City of Los Angeles. Los Angeles Achieves Mayor Garcetti's goal of 20 Percent Water Savings, February 2, 2017. Available at: <https://www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings>, accessed August 2019.

***Threshold (d): Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

**(1) Construction**

Construction of the Project would require demolition of the existing buildings and associated carports and parking areas as well as excavation and construction of the new Project buildings on the Project Site. These activities would generate demolition, excavation, and construction-related waste including, but not limited to, 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 Los Angeles County. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used for ground cover. Thus, soil export is not included in the Project's C&D waste totals. Although unlikely, Project construction-related C&D waste could be exported to out-of-County jurisdictions as existing facilities in Kern, Orange, Riverside, San Bernardino, and Ventura Counties are currently accepting waste from Los Angeles County. Future use of the waste-by-rail system to the Mesquite Regional Landfill in Imperial County is also considered.<sup>105</sup>

**Table IV.N.1-10, *Estimated C&D Waste Generation***, provides an estimate of the amount of construction and demolition debris that would be generated by Project construction. As shown, demolition of the Project Site's 49,000 square feet of residential structures and 346 cubic yards of parking, asphalt, and hardscape areas, would generate approximately 4,308 tons of waste. Development of the Project would also include the construction of 198,350 square feet of residential uses, 57,740 square feet of hotel uses, 12,500 square feet of commercial/restaurant, and an 189,705 square-foot parking structure. Based on these quantities, construction of the Project is estimated to generate 1,001 tons of construction debris, for a combined total of 4,308 tons of C&D waste. These numbers do not take into account the amount of C&D waste that would be diverted via source reduction and recycling programs within the City. Consistent with requirements of AB 939, a minimum of 50 percent of the C&D waste would be recycled. Conservatively, a 50 percent reduction would reduce C&D Waste to approximately 2,154 tons. This analysis is accordingly conservative

<sup>105</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, page 39, prepared by County of Los Angeles Department of Public Works, dated December 2016.

**TABLE IV.N.1-10**  
**ESTIMATED C&D WASTE GENERATION**

<b>Debris Type</b>	<b>Quantity<sup>a</sup></b>	<b>Generation Factor</b>	<b>Total Solid Waste Generation (tons)</b>
<b>Demolition</b>			
Residential	49,000 s.f.	127 lbs./s.f. <sup>c</sup>	3,112
Parking/Asphalt/Hardscape Areas <sup>d</sup>	346 cy.	1 cy = 0.5625 tons <sup>b</sup>	195
<b>Site Preparation Subtotal</b>			<b>3,307</b>
<b>Construction</b>			
Residential	198,350 s.f.	4.39 lbs./s.f. <sup>c</sup>	435
Hotel	57,740 s.f.	4.39 lbs./s.f. <sup>c</sup>	127
Commercial/Restaurant	12,500 s.f.	4.34 lbs./s.f. <sup>c</sup>	27
Parking Structure	189,705 s.f.	4.34 lbs./s.f. <sup>c</sup>	412
<b>Construction Subtotal</b>			<b>1,001</b>
<b>Total</b>			<b>4,308</b>

NOTE: cy. = cubic yards; s.f. = square feet; lbs. = pounds.

<sup>a</sup> Quantities are based on overall gross square footage, as opposed to square footage based on City Floor Area Ratio (FAR) calculation.

<sup>b</sup> CalRecycle Diversion Study Guide, Appendix I, Conversion Factors: Construction and Demolition, <http://www.calrecycle.ca.gov/LGCentral/Library/DSG/ICandD.htm>, Accessed October 2015.

<sup>c</sup> Generation factors provided by the United States Environmental Protection Agency, "Estimating 2003 Building-Related Construction And Demolition Materials Amounts," Tables A-1, A-2, and A-3, 2003.

<sup>d</sup> 18,000 square feet of parking/asphalt area and 10,000 square feet of hardscape area.

SOURCE: ESA, 2019.

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. 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 permitted to receive C&D waste or exported to an out-of-County facility currently accepting waste from Los Angeles County. As shown above, the remaining capacity of the Azusa Land Reclamation landfill is estimated at 52,750,160 cubic yards (29,671,965 tons) with a projected closure date of year 2046.<sup>106</sup> The Project's projected total solid waste disposal during construction would represent approximately 0.01 percent of the estimated remaining capacity at this particular County's landfill alone, which does not even take into consideration existing capacity at other sites within the County and out-of-County that

<sup>106</sup> Azusa Land Reclamation Fact Sheet, prepared by Waste Management, 2014, [https://www.wmsolutions.com/pdf/factsheet/Azusa\\_Land\\_Reclamation.pdf](https://www.wmsolutions.com/pdf/factsheet/Azusa_Land_Reclamation.pdf), accessed November 2015.

could potentially be utilized for disposing of Project C&D waste. Therefore, the County's City-certified waste processing facilities would have adequate capacity to accommodate Project-generated C&D waste.

Also, as discussed in the Project's Initial Study (see Appendix A of this Draft EIR), it is possible that lead-based paint (LBP), asbestos and/or other hazardous paint residues are present in the buildings. Consistent with applicable regulatory requirements, comprehensive surveys of the existing buildings would occur prior to demolition in accordance with applicable regulations — including the National Emissions Standards for Hazardous Air Pollutants standards, South Coast Air Quality Management District (SCAQMD) Rule 1403, and California Division of Occupation Safety and Health (Cal/OSHA) requirements — to verify the presence or absence of any of these materials. If LBPs and/or ACMs are encountered, regulatory compliance measures would be implemented that require remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Further, any disposal of such materials following removal would occur at a certified facility for these hazardous materials such as the Kettleman Hills Facility. **Adherence to these regulatory compliance measures would reduce risks associated with LBPs and ACMs to acceptable levels per state regulatory standards. In addition, the Project's construction activities would not exceed capacity of local solid waste infrastructure or impair the attainment of solid waste reduction goals. Construction impacts with respect to solid waste disposal would be less than significant.**

## (2) Operation

**Table IV.N.1-11, *Estimated Operational Solid Waste Generation***, provides an estimate of the operational solid waste generated by the Project. As shown in the table, Project operations would generate a net increase of 2,637 pounds per day, or 481.16 tons per year of solid waste, taking into consideration the waste currently generated by uses on the Project Site. Some of the waste generated at the Project Site would be diverted from landfills via source reduction and recycling programs within the City. For this analysis, it is conservatively assumed that 76.4 percent of the Project's waste would be diverted based on Citywide diversion rates, although the diversion rate is expected increase in the near future as a result of regulatory measures. If the Project achieves the assumed diversion rate of 76.4 percent, Project operations would generate a net increase of 622 pounds per day and 113.55 tons of solid waste per year.

The Project's annual solid waste generation, not accounting for diversion, would be approximately 0.005 percent of the County's annual waste generation of 9,457,378 tons per year and would account for less than 0.0004-percent of the remaining 114-million-ton capacity in the County's Class III landfills. With diversion, the Project's annual solid waste generation would be approximately 0.001 percent of the County's annual waste generation and would account for less than 0.0001 percent of the remaining capacity.

By 2022, the year of Project completion, the County expects that an approximate additional 58,822,376 tons of the remaining 114-million-ton capacity would be used in the County's Class III landfills. This would leave an available capacity of 55,17,624 tons of capacity in 2022 to serve the Project, assuming no additional disposal facilities are brought online or otherwise expanded to add additional capacity.

**TABLE IV.N.1-11  
ESTIMATED OPERATIONAL SOLID WASTE GENERATION**

<b>Land Use</b>	<b>Quantity (units/s.f.)</b>	<b>Factor<sup>a</sup></b>	<b>Solid Waste Generation (lbs/day)</b>	<b>Solid Waste Generation (tons/year)</b>
<b>Existing Land Uses</b>				
<b>Residential</b>				
(43 multi-family + 1 single-family)	44 units	12.23 lbs./unit <sup>b</sup>	538	98.19
<b>Total</b>			<b>538</b>	<b>98.19</b>
<b>Proposed Land Uses</b>				
<b>Residential</b>	210 units	12.23 lbs./unit	2,568	468.66
<b>Hotel</b>	136 rooms	4 lbs./unit	544	99.28
<b>Commercial/</b>				
<b>Restaurant</b>	12,570 s.f.	5 lbs./1,000 s.f./day	63	11.41
<b>Total</b>			<b>3,175</b>	<b>579.35</b>
<b>Net Increase (Proposed-Existing) (pre-diversion)</b>			<b>2,637</b>	<b>481.16</b>
<b>Net Increase (Proposed-Existing) (post-diversion) <sup>c</sup></b>			<b>622</b>	<b>113.55</b>

NOTE: s.f. = square feet; lbs. = pounds.

<sup>a</sup> Generation factors provided by the CalRecycle website: Estimated Solid Waste Generation Rates. <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>. Accessed October 2015.

<sup>b</sup> Generation factor provided applies to both single-family residential and multi-family residential.

<sup>c</sup> Based on an anticipated diversion rate of 76.4 percent for operations.

SOURCE: ESA, 2019.

Further, as stated in the Existing Conditions above, the 2015 daily disposal rate in the County landfills was 15,157 tons per day versus a maximum daily capacity of 30,449 tons per day, resulting in an unused additional daily capacity of 15,292 tons per day. The Project's additions to the daily disposal of 1.54 tons<sup>107</sup> would be approximately 0.01 percent of the unused, available daily capacity of 15,292 tons per day, and this is

<sup>107</sup> 481.16 tons per year / 312 = 1.54 tons per day. Assumes landfills operate six days per week. 52 weeks X 6 days = 312 days.

assuming no diversion, the rate of which is assumed to be 74.6 percent. If the Project achieves the standard diversion rate, it's contribution to the available capacity in County landfills would be approximately 0.002 percent.<sup>108</sup>

As noted above, the Sunshine Canyon Landfill is the primary recipient of City waste disposal. The maximum daily capacity for this landfill is 12,100 tons per day and the 2015 disposal rate was 7,701 tons per day, indicating an unused daily capacity of 4,399 tons. If all of the Project's waste were taken to Sunshine Canyon Landfill, the Project's additions to the daily disposal of 1.54 tons would be approximately 0.04 percent of the unused daily capacity of 4,399 tons per day, assuming no diversion. With diversion at the City's 76.4 percent rate, it would be approximately 4,399 tons a day, or 0.01 percent of unused capacity at the Sunshine Canyon Landfill site alone.<sup>109</sup>

As described in the CoLWMP 2015 Annual Report, future disposal needs over the next 15-year planning horizon (2030) 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 in coming years. Such strategies include 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) promote out-of county disposal (including waste-by-rail).<sup>110</sup> It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity via the above listed strategies.

As it is previously discussed, this section analyzes solid waste generation and not merely disposal and therefore, presents a conservative analysis. In actual practice in light of robust diversion, the Project's solid waste generation to landfills would be far less than the most conservative estimates analyzed herein. The Project would, in accordance with the requirements of applicable State and local laws and policies, provide recycling areas or rooms for tenants, provision of information to tenants regarding the types of materials collected for recycling and nature of recycling facilities on the premises, and hauling of recyclable which would on its own significantly reduce the amount of solid waste disposed of in landfills as a result of the Project. In addition, the Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code (CALGreen) and the City of Los Angeles Green Building Code and achieve United States Green Building Standards (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification under the LEED version 2009 (v3) or the Silver Certification under the LEED v4 rating system. In doing so, the Project would

<sup>108</sup> 1.54 tons per day X 0.236 = 0.36 tons per day/ 15,292 tons = 0.002.

<sup>109</sup> 1.54 tons per day X 0.236 = 0.36 per day/ 4,399 tons = 0.01.

<sup>110</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, page 26, prepared by County of Los Angeles Department of Public Works, dated December 2016.

incorporate measures and performance standards to support its LEED Gold or Silver Certification that would also have the effect of limiting Project solid waste generation.

**Based on the above, Project-generated waste from operation 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, impacts on solid waste disposal from Project operation would be less than significant.**

***Threshold (e): Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

The Project would comply with applicable federal, State, and local 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's construction contractor would deliver all construction and demolition 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 AB 939 and the City's SWIRP, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Therefore, construction of the Project would not conflict with applicable solid waste statutes and regulations related to solid waste.

With regard to operation, in accordance with the City's 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 residents. In addition, the Project would promote compliance with AB 939 through source reduction and recycling programs, including compliance with the City's Curbside Recycling Program and Waste Hauler Permit Program. As discussed above, the Project would be designed and operated to meet or exceed the applicable requirements of CALGreen and the City of Los Angeles Green Building Code and achieve USGBC LEED Gold Certification under the LEED version 2009 (v3) or the Silver Certification under the LEED v4 rating system. The Project would incorporate measures and performance standards to support its LEED Gold or Silver Certification. Detailed Project components would be finalized at the time of plan submittal to the City for the necessary building permits and would be reviewed pursuant to checklist items in the City's Green Building Code. 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.<sup>111</sup> The Project's commitment to LEED certification and incorporation of recycling facilities to promote waste diversion from landfills would not conflict with but would rather implement the City of Los Angeles Source Reduction and Recycling Element, the City of Los Angeles General Plan Framework Element and Curbside Recycling Program. **Therefore, the Project would comply with all State, and local statutes and regulations related to solid waste. Impacts regarding consistency with the applicable State and local statutes, ordinances, policies, and objectives would be less than significant.**

## e) Cumulative Impacts

### (1) Infrastructure

#### (a) Water

Development of the Project in conjunction with the 137 related projects identified in Chapter 3, *General Description of Environmental Setting* would cumulatively increase water 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 such project. All projects are required to obtain SAR reports based on flow testing of facilities to verify that there is available service. Furthermore, larger projects that meet the relevant criteria would be required to comply with SB 610 and potentially also, with SB 221, which call for the creation of a detailed analysis of available water infrastructure and supply needed to serve the projects. Project developers are required to install or upgrade water infrastructure facilities where necessary to meet new project demand and development cannot proceed without appropriate verification and approval relative to impacts on water supply infrastructure. Furthermore, LADWP as well as the City of Los Angeles Department of Public Works conduct regular ongoing evaluations of infrastructure and conduct routine system improvements where required, in addition to performing repairs and upgrades to facilities that become damaged or inoperable. **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 incremental effects are not considered cumulatively considerable and the cumulative impact of the Project in conjunction with the related projects is not considered significant.**

#### (b) Wastewater

As with the Project, all related projects would be subject to the provisions of the Municipal Code 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, the related projects would be subject to LAMC Section 64.15, which requires a determination by LADPW that there is sufficient sewer capacity

<sup>111</sup> City of Los Angeles Bureau of Sanitation, "Zero Waste Progress Report", March 2013. Available at: [https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04\\_Zero%20Waste%20Progress%20Report\\_March%202013.pdf](https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf). Accessed August 2019.

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 applicable fees and mitigation requirements to improve infrastructure if necessary to account for the project would be required. The preparation of a SCAR or WWSI, takes into account other recently approved SCARs or WWSIs, to evaluate the cumulative impact of all known SCARs or WWSIs on the sewer system. Also, in accordance with LAMC Sections 64.11 and 64.12, 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, in addition to upgrading systems where necessary. **Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.**

## (2) Water Supply

The 137 related projects would cumulatively contribute, in conjunction with the Project, to water demand in the Project area. As shown in **Table IV.N.1-12, *Estimated Cumulative Water Demand***, the estimated cumulative water demand for the related projects is 5,063,631 gpd or 5,672 AFY and the estimated cumulative water demand for the development of the Project and the related projects is 5,123,562 gpd or 5,739 AFY.

As stated above, the LADWP expects to have a reliable supply of up to 642,400 AF for single dry year and multi-dry years and 611,800 AF for an average weather year in 2020; 676,900 AF for single dry year and multi-dry years and 644,700 AF for an average weather year in 2025; and 709,500 AF for single dry year and multi-dry years and 675,700 AF for an average weather year in 2040. This is in contrast to the estimated demand of 611,815 AF in 2020; 644,706 AF in 2025; and 675,685 AF in 2040. The demand would result in a surplus of 30,585 AF for single dry year and multi-dry years and a shortage of 15 AF for an average weather year in 2020. For 2025, the demand would result in a surplus of 32,194 AF for single dry year and multi-dry years and a shortage of 6 AF for an average weather year. For 2040, the demand would result in a surplus of 33,815 AF for single dry year and multi-dry years and a surplus of 15 AF for an average weather year. If the targeted water demand reductions in the Mayor's Sustainable City pLAN are met, then LADWP's demand projections of 485,600 AF in 2020 would result in a surplus of 156,800 AF for single dry year and multi-dry years and a surplus of 126,200 AF for an average weather year. For 2025, if the pLAN is met, then LADWP's demand projections of 533,000 AF would result in a surplus of 143,900 AF for single dry year and multi-dry years and a surplus of 111,700 AF for an average weather year. If the pLAN is met in 2040, then LADWP's demand projections of 565,600 AF would result in a surplus of 143,900 AF for single dry year and multi-dry years and a surplus of 110,100 AF for an average weather year. With the anticipated cumulative water demand of 5,123,562 gpd or 5,739 AFY, the demand for water would fall well within the available and projected water supply in 2020, 2025, and 2040, under the LADWP's 2015 UWMP.

**TABLE IV.N.1-12**  
**ESTIMATED CUMULATIVE WATER DEMAND**

<b>Land Use</b>	<b>Quantity</b>	<b>Factor (gpd)<sup>a</sup></b>	<b>Wastewater Generation (gpd)</b>	<b>Daily Water Demand (gpd)<sup>b</sup></b>	<b>Annual Water Demand (AFY)<sup>c</sup></b>
Proposed Use					
Related Project					
Residential <sup>d</sup>	16,517 units	150	2,477,550	2,973,060	3,330
Office <sup>e</sup>	5,855,219 s.f.	0.17	995,387	1,194,464	1,338
Commercial/Retail/ Restaurant <sup>f</sup>	3,370,321 s.f.	0.05	168,516	202,219	227
Hotel	4,782 rooms	120	573,840	688,608	771
Schools	100 students	10	1,000	1,200	1
Other <sup>g</sup>	67,991	0.05	3,400	4,080	5
Total Related Projects			<b>4,219,693</b>	<b>5,063,631</b>	<b>5,672</b>
Proposed Project (net increase)			<b>62,995</b>	<b>59,931</b>	<b>67</b>
Cumulative Water Demand			<b>4,282,688</b>	<b>5,123,562</b>	<b>5,739</b>

Note: SF = square feet; gpd = gallons per day; AFY = acre feet per year.

a Wastewater generation factors obtained from the *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.

b Water demand is consistent with wastewater generation. To be conservative, 20 percent was added to account for outdoor water use.

c An acre-foot equals approximately 325,851 gallons

d Rates for residential wastewater generation vary depending on unit type and size. It was assumed that all residential projects would be multi-family with an average size of two bedrooms.

e Rate shown is for Office Building with Cooling Tower.

f Rate shown is for Commercial Use and Retail Area (greater than 100,000 SF). At this time, number of restaurant seats is unknown. As such, the commercial and retail area rate of 0.05 was used.

g Other land uses include storage, sound stage, and synagogue uses. The generation factor for commercial/retail/restaurant was used.

SOURCE: ESA, 2019.

Further, the LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for new large projects (i.e., residential projects with at least 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, etc.) that may or may not have been included within the growth projections of the UWMP. The WSA for such projects, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. In addition, as described above, SB 221 requires that for residential subdivisions with 500 units or more that are in non-urban areas, written verification from the service provider (i.e., LADWP) be submitted indicating sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the Project. Accordingly, between the preparation every five years of a new UWMP, which assesses for a 25-year time horizon, LADWP's water supply and demand taking into account SCAG projected population growth figures, and SB 610 and SB 221 analyses, which would require additional reassessment or assessment of water supplies for anticipated and unforeseen larger projects, LADWP has and will fully analyze water demand and supply taking into account the related projects in addition to all new large projects in the LADWP service area. Based on the 2015 UWMP, LADWP has determined it will have more than sufficient water supplies to meet the City's growth in demand moving forward to 2040, which conclusion will continually be reanalyzed and reported to the public by LADWP.

The LADWP plans to accommodate future demand in part by shifting the proportion of water supply being purchased from the MWD to more secure, local sources. Further, during times of severe water shortages, when MWD cuts allocations of imported water, LADWP customers have shown in the most recent extended drought that they can adapt and drastically reduce consumption as per restrictions in the Emergency Water Conservation Plan Ordinance. Moreover, MWD's 2015 UWMP shows that, with its investments in storage, water transfers and improving the reliability of the SWP, water shortages are not expected to occur within the next 25 years, even in multi-year drought scenarios, taking into account anticipated population growth in accordance with SCAG estimates. As previously indicated, both the 2015 UWMP and 2015 IRP anticipate a surplus of available water to meet the projected demand through 2040.

Therefore, the City has strategies in place for addressing future water needs, with analyses of future supply of and demand for water resources. Compliance of the Project and future development projects with regulatory requirements that promote water conservation, such as the LAMC, including the City's Green Building Code, would also assist in assuring that adequate water supply is available on a cumulative basis.

**Based on these facts, the Project would not have a cumulatively considerable impact on water supply and cumulative impacts would be less than significant.**

### (3) Wastewater Treatment Capacity

The 137 related projects identified by the City would cumulatively contribute, in conjunction with the Project, to wastewater generation in the Hyperion Service Area. For purposes of this analysis, conservatively assuming the TWRP and LAGWRP are already

operating at or near capacity, wastewater generated by the related projects is assumed to be treated at the HWRP.

As shown in **Table IV.N.1-13, *Estimated Cumulative Wastewater Generation***, the estimated average wastewater flow generation associated with the related projects is approximately 4,219,693 gpd. As indicated, the Project would contribute an additional 62,995 gpd of average wastewater flow. The estimated generation by the Project and the related projects would be a combined total of approximately 4,282,688 gpd of average wastewater flow. This represents 2.4 percent of the HWRP's total remaining capacity of 175 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures by the related projects, which would be expected, making this analysis extremely conservative. Therefore, Project impacts on wastewater treatment system capacity would not be cumulatively considerable, and cumulative impacts would be less than significant.

**TABLE IV.N.1-13  
ESTIMATED CUMULATIVE WASTEWATER GENERATION**

<b>Land Uses</b>	<b>Quantity (units/square feet)</b>	<b>Generation Factor<sup>a</sup></b>	<b>Average Daily Wastewater Generated (gpd)</b>
Proposed Use			
Related Projects			
Residential	16,517 units	150	2,477,550
Office	5,855,219 s.f.	0.17	995,387
Commercial/Retail/Restaurant	3,370,321 s.f.	0.05	168,516
Hotel	4,782 rooms	120	573,840
Schools	100 students	10	1,000
Other <sup>c</sup>	67,991 s.f.	0.05	3,400
<b>Total</b>			<b>4,219,693</b>
<b>Proposed Project (net increase)</b>			<b>62,995</b>
<b>Cumulative Wastewater Generation</b>			<b>4,282,688</b>

<sup>a</sup> Wastewater generation factors obtained from the *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.

<sup>b</sup> Peak wastewater flow is calculated by multiplying the average flow by a peak flow factor of 1.7.

<sup>c</sup> Other land uses include storage, sound stage, and synagogue uses. The generation factor for commercial/retail/restaurant was used.

SOURCE: ESA, November 2019.

The HWRP currently meets applicable water quality standards as set forth by its NPDES Permit.<sup>112</sup> 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 the related projects are within applicable water quality standards. Thus, cumulative impacts on Santa Monica Bay water quality relative to wastewater treatment requirements would be less than significant and the Project contribution to any impact would not be cumulatively considerable.

As with the Project, all related projects would be subject to the provisions of the Municipal Code 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, the related projects would be subject to LAMC Section 64.15, which requires a determination by LADWP 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 applicable fees and mitigation requirements to improve infrastructure if necessary to account for the project would be required. The preparation of a SCAR or WWSI, takes into account other recently approved SCARs or WWSIs, to evaluate the cumulative impact of all known SCARs or WWSIs on the sewer system. **Also, in accordance with LAMC Sections 64.11 and 64.12, 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, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.**

#### (4) Solid Waste Capacity

Solid waste disposal in California disposal is a regional issue addressed by regional agencies. In the case of the Project, is the County of Los Angeles that addressed the regional issues. As discussed above, the State requires that the Siting Element 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 CoLWMP 2015 Annual Report anticipates a ten percent increase in population growth within the County of Los Angeles by 2030 and an increase of 15 percent in

<sup>112</sup> 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, Available at: <https://www.epa.gov/sites/production/files/2017-09/documents/npdes-ca0109991-r4-2017-0045-hyperion-2017-02-02.pdf>, accessed July 2018.

employment.<sup>113</sup> The cumulative development in the Project Site area would contribute an increment of the overall projected demand for waste disposal.

(a) *Construction*

Similar to the Project, the related projects within the City would generate the inert C&D waste. Also similar to the Project, the related projects would be subject to the Citywide Construction and Demolition Waste Recycling Ordinance and the Waste Hauler Permit Program, and the construction and demolition waste would be recycled to the extent feasible. Their 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 52,750,160 cubic yards (29,671,965 tons) with a projected closure date of year 2046. Given this future capacity, it is expected that all construction and debris waste can be accommodated for during that time, and cumulative impacts regarding the disposal of C&D waste would not occur. Moreover, the CoLWMP 2015 Annual Report concludes that there is adequate capacity within permitted solid waste facilities to serve the County through the 15-year planning period of 2016 through 2030.<sup>114</sup> Therefore, cumulative impacts due to demolition and construction waste would be less than significant.

In addition, should any LBP and/or ACMs be encountered during construction, standard regulatory compliance measures would be implemented that require remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Similar measures would be implemented by the related projects to the extent any LBP or ACMs are encountering during the projects'

respective construction processes. Further, any disposal of such materials following removal would occur at a certified facility for these hazardous materials such as the Kettleman Hills Facility. Kettleman Hills has a projected remaining life over 25 years.<sup>115</sup> Adherence with these regulatory compliance measures by the Project and the related projects would reduce risks associated with LBPs and ACMs to acceptable levels and associated cumulative impacts would be less than significant. **Adherence to these regulatory compliance measures would reduce risks associated with LBPs and ACMs to acceptable levels per state regulatory standards. In addition, the Project in combination with related projects activities would not exceed capacity of local infrastructure or impair the attainment of solid waste reduction goals. Construction impacts with respect to solid waste disposal would not be cumulatively significant.**

<sup>113</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, Appendix E-2, Table 4, Population, Employment, Real Taxable Sales, and Waste Generation in Los Angeles County, prepared by County of Los Angeles Department of Public Works, dated December 2016.

<sup>114</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, prepared by County of Los Angeles Department of Public Works, dated December 2016.

<sup>115</sup> Chemical Waste Management, Inc. Kettleman Hills, Brochure, 2015. Brochure indicates project life remaining of 30+ years as of 2015.

**(b) Operation**

As shown in **Table IV.N.1-14, Operational Cumulative Solid Waste Generated by Operations**, the estimated solid waste requiring landfill disposal for the related projects, not accounting for diversion and recycling, would be 273,504 pounds per day or 49,914.49 tons per year. The cumulative yearly disposal with the Project (pre-diversion) would be 276,141 pounds per day or 50,395.65 tons per year. Again, these estimates do not take into account the amount of solid waste that would potentially be diverted via source reduction and recycling programs within the City, assumed by the City to be approximately 76.4 percent. Furthermore, the solid waste estimates in Table IV.N.1-14 do not account for credit resulting from existing uses and thus, represents a conservative analysis. Assuming only a 76.4 percent diversion rate, the amount of solid waste by the related projects and the Project would be reduced to 11,893 tons per year.

**TABLE IV.N.1-14  
CUMULATIVE SOLID WASTE GENERATED - OPERATIONS**

<b>Land Uses</b>	<b>Quantity (units/ employees/ square feet)</b>	<b>Factor<sup>a</sup></b>	<b>Solid Waste Generatio n (lbs/day)</b>	<b>Solid Waste Generated (tons/yr)</b>
<b>Related Projects</b>				
Residential	16,517 units	12.23 lbs./unit/day <sup>b</sup>	202,003	36,865.55
Office	5,855,219 s.f.	6 lbs./1000 s.f./day	35,131	6,411.41
Commercial/Retail/Restaurant	3,370,321 s.f.	5 lbs./1000 s.f./day	16,852	3,075.49
Hotel	4,782 rooms	4 lbs./unit/day	19,128	3,490.86
Schools	100 students	0.5 lbs/student/day	50	9.13
Other <sup>c</sup>	67,991 s.f.	5 lbs./1000 s.f./day	340	62.05
<b>Total</b>			<b>273,504</b>	<b>49,914.49</b>
<b>Proposed Project</b>			<b>2,637</b>	<b>481.16</b>
<b>Cumulative Solid Waste</b>			<b>276,141</b>	<b>50,395.65</b>

<sup>a</sup> Generation factors provided by the CalRecycle website: Estimated Solid Waste Generation Rates. <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>. Accessed November 2015.

<sup>b</sup> Generation factor provided applies to both single-family residential and multi-family residential.

<sup>c</sup> Other land uses include storage, sound stage, and synagogue uses. The generation factor for commercial/retail/restaurant was used.

SOURCE: ESA, 2019.

As the County's Class III landfills serve the entire County of Los Angeles, the Project and the 137 related projects would represent only a small portion of the overall regional service area. The primary recipient of City waste disposal, the Sunshine Canyon Landfill, has a remaining capacity of 72.61 million tons with an expected life expectancy of 22



years. The Azusa Land Reclamation Landfill, the one permitted Inert Waste Landfill with a full solid waste facility permit, has a remaining capacity of 29,671,965 tons with an expected closure date of year 2046. The Project and related projects' solid waste represent only a fraction of the available capacity able to be accommodated at the serving landfills. The cumulative annual solid waste generation, not accounting for diversion, would be a negligible increment to the County's annual waste generation of 9,457,378 tons per year, 0.53-percent, and would account for 0.04-percent of the remaining 114 million-ton capacity in the County's Class III landfills, respectively. Accordingly, the cumulative impact of the Project and the identified related projects would not come close to exceeding the available capacity of existing facilities.

As noted above, the CoLWMP 2015 Annual Report indicates that future disposal needs over the next 15-year planning horizon (2030) 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. Up to planning horizon year 2030, the County expects that cumulative solid waste generation would be approximately 114,654,187 tons of the remaining 114-million-ton capacity. It is anticipated with diversion (assuming a Countywide 65 percent diversion rate), available capacity would remain in 2030 to serve the County.

The estimated solid waste generation does not account for any credit resulting from existing uses and, as such, represent a conservative analysis of estimated solid waste. As discussed above, the Project impacts on solid waste disposal would be less than significant. **Cumulative waste generation is provided for in the CoLWMP for the 15-year planning period ending in 2030 as the analysis includes projected growth.<sup>116</sup> Therefore, the cumulative development would not alter the County's ability to address landfill needs via existing capacity and other options for increasing capacity.**

### (5) Consistency with Applicable Regulations

In addition, similar to the Project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and 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 the City for the necessary building permits and would be reviewed pursuant to checklist items in the City's Green Building Code, as applicable. Based on the legal mandates for compliance with applicable laws and regulations for all projects, cumulative impacts regarding consistency with the applicable federal, State and local statutes and regulations would be less than significant.

<sup>116</sup> County of Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report, Countywide Summary Plan & Countywide Siting Element, prepared by County of Los Angeles Department of Public Works, dated December 2016.

**Based on the above, impacts to the solid waste system from cumulative development would be less than significant and thus, the Project would not contribute to a cumulatively significant solid waste impact or result in a cumulatively considerable impact**

#### **f) Mitigation Measures**

Project impacts regarding utilities infrastructure, water supply, wastewater demand, and solid waste disposal would be less than significant. Therefore, no mitigation measures are required.

#### **g) Level of Significance After Mitigation**

Project-level and cumulative impacts with regard to utilities demand and infrastructure would be less than significant without mitigation.

## **IV. Environmental Impact Analysis**

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### **N.2 Utilities and Service Systems – Energy Infrastructure**

#### **1. Introduction**

This section of the Draft EIR analyzes the Project's potential impacts on electricity and natural gas conveyance systems serving the Project Site. In accordance with the intent of Appendix F of the State CEQA Guidelines, the energy demands of the Project, including electricity and natural gas, are evaluated in Section IV.D, *Energy*, of the Draft EIR. Other utilities and service systems, including water and wastewater demand and infrastructure, are addressed in Section N.1, *Utilities and Service Systems – Water, Wastewater, and Solid Waste*, above.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

###### **(1) Federal**

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation. Domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which established, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America.

Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include a state

level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.<sup>1</sup>

## (2) State of California

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the State's energy needs.

The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section IV.D, Energy, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

### (a) *California Independent System Operator*

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operation standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.<sup>2</sup>

### (b) *California Public Utilities Commission*

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas and Electric (SDG&E). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUC's jurisdiction.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation. Infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.<sup>3</sup>

<sup>1</sup> United States Government, Federal Energy Regulatory Commission. Available at: <https://www.ferc.gov/about/about.asp>. Accessed August 29, 2019.

<sup>2</sup> California Independent System Operator, About Us. Available at: <http://www.caiso.com/about/Pages/default.aspx>. Accessed August 29, 2019.

<sup>3</sup> State of California Public Utilities Commission, Utilities and Industries. Available at: <https://www.cpuc.ca.gov/utilitiesindustries/>. Accessed August 29, 2019.

(c) *California Energy Commission*

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.<sup>4</sup>

(d) *Senate Bill 1389*

Senate Bill (SB) 1389 (Public Resources Code Sections 25300-25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report in two volumes.<sup>5</sup> Volume I, which was published on August 1, 2018, highlights the implementation of California's innovative policies and the role they have played in moving toward a clean energy and economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions address these issues and ensure the reliability of energy resources.

(3) **Regional**

There are no regional regulations with respect to electricity and natural gas infrastructure. For a discussion of regional regulation pertaining to energy conservation, refer to Section IV.D, Energy, of this Draft EIR.

(4) **Local**

There are no local regulations with respect to electricity and natural gas infrastructure. For a discussion of local regulation pertaining to energy conservation, refer to Section IV.D, Energy, of this Draft EIR.

## **b) Existing Conditions**

(1) **Electricity**

LADWP provides electrical service throughout the City of Los Angeles 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 the 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

<sup>4</sup> State of California, California Energy Commission. Home. Available at: <https://www.energy.ca.gov/>. Accessed August 29, 2019.

<sup>5</sup> 2018 Integrated Energy Policy Report Update, Volume II, February 2019. Available at: [https://ww2.energy.ca.gov/2018\\_energypolicy/](https://ww2.energy.ca.gov/2018_energypolicy/). Accessed August 29, 2019.

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, the LADWP has a net dependable generation capacity of 7,531 MW.<sup>6</sup> On September 1, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,555 MW.<sup>7</sup> Approximately 30 percent of LADWP's 2017 electricity mix were from renewable sources, which is similar to the 29 percent statewide percentage of electricity purchases from renewable sources.<sup>8</sup> The annual electricity sale to customers for the 2016-2017 fiscal year was approximately 22,878 million kilowatt hours (kWh).<sup>9</sup> The Project Site's current annual electrical energy demand is 258,959 kWh.<sup>10</sup>

## (2) Natural Gas

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 Mexican border.<sup>11</sup>

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.<sup>12</sup> The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. Gas supply available to SoCalGas from California sources averaged 122 million cubic feet (cf) per day in 2015

<sup>6</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resources Plan, p. 17, 2017. Available at: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=12rv2xzfjk\\_17&\\_afLoop=15054136999415](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12rv2xzfjk_17&_afLoop=15054136999415). Accessed August 29, 2019.

<sup>7</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resources Plan, p. 17, 2017. Available at: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=12rv2xzfjk\\_17&\\_afLoop=15054136999415](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12rv2xzfjk_17&_afLoop=15054136999415). Accessed August 29, 2019.

<sup>8</sup> California Energy Commission, Utility Annual Power Content Labels for 2017, Los Angeles Department of Water and Power, [https://www.energy.ca.gov/pcl/labels/2017\\_labels/LADWP\\_2017\\_PCL.pdf](https://www.energy.ca.gov/pcl/labels/2017_labels/LADWP_2017_PCL.pdf). Accessed August 29, 2019.

<sup>9</sup> Los Angeles Department of Water and Power, 2017 Retail Electric Sales and Demand Forecast, p. 14, 2017, [http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retail%20Sales%20Forecast\\_Final.pdf](http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retail%20Sales%20Forecast_Final.pdf). Accessed August 29, 2019.

<sup>10</sup> Estimated existing demand is based on per unit statistical averages equivalent to those used to estimate the Project's future demand (see Appendix E, Energy Worksheets, of this Draft EIR).

<sup>11</sup> SoCalGas, Company Profile. Available at: <http://www.socalgas.com/about-us/company-info.shtml>. Accessed April 2018.

<sup>12</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 80, 2018. Available at: [https://www.socalgas.com/regulatory/documents/cgr/2018\\_California\\_Gas\\_Report.pdf](https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf). Accessed September 2019.

(the most recent year for which data are available).<sup>13</sup> The annual natural gas sale to customers in 2016 was approximately 304,290 million kilo British thermal units (kBtu). The annual natural gas sale to customers in 2016 was approximately 304,290 million kilo British thermal units (kBtu).<sup>14</sup> The Project Site's current annual natural gas demand is 717,687 cf.<sup>15</sup>

Existing natural gas lines serve the Project Site, including a 6-inch line at the north side of the Yucca Street centerline (west portion of Yucca Street), transitioning to a 4-inch line along the easterly property frontage. A 3-inch gas line is located in Argyle Avenue and a 1- 4-inch gas line is located in Vista Del Mar Avenue.<sup>16</sup>

### 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 electric and natural infrastructure if it would:

***Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.***

In assessing the Project's potential impacts related to electric and natural gas infrastructure in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance, identified above.

The factor below from the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide) will also be used where applicable and relevant to assist in analyzing the Appendix G question:

Would the Project result in the need for new (off-site) energy supply facilities, or major capacity enhancing alterations to existing facilities?

<sup>13</sup> Ibid.

<sup>14</sup> Sempra Energy, 2016 Annual Report, 2017, Available at: [https://www.sempra.com/sites/default/files/microsites/2016\\_annualreport/](https://www.sempra.com/sites/default/files/microsites/2016_annualreport/). Accessed March 2018. Converted from 294 billion cubic feet and a conversion factor of 1,035 Btu per cubic foot based on United States Energy Information Administration data (see: United States Energy Information Administration, Natural Gas, Heat Content of Natural Gas Consumed, March 30, 2018, [https://www.eia.gov/dnav/ng/ng\\_cons\\_heat\\_a\\_EPG0\\_VGTH\\_btucf\\_a.htm](https://www.eia.gov/dnav/ng/ng_cons_heat_a_EPG0_VGTH_btucf_a.htm). Accessed April 2018.

<sup>15</sup> Estimated existing demand is based on per unit statistical averages equivalent to those used to estimate the Project's future demand (See Appendix E, Energy Worksheets, of this Draft EIR).

<sup>16</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, Navigate LA. Available at: <https://navigatela.lacity.org/navigatela/>. Accessed August 29, 2019.

## b) Methodology

This analysis evaluates the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity. Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using the California Emissions Estimator Model (CalEEMod), consistent with the Project's air quality and GHG emissions calculations as discussed in Section IV.B, *Air Quality*, and Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR.<sup>17</sup> Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was assumed to be negligible. In terms of natural gas, construction activities typically do not involve the consumption of natural gas.

Annual consumption of electricity during operation (including electricity usage associated with the supply and conveyance of water) and natural gas from Project operation was calculated using demand factors provided in CalEEMod based on the 2016 Title 24 standards, which went into effect on January 1, 2017. The CEC estimated that the 2016 Title 24 standards are 28 percent more efficient than the 2013 Title 24 standards for residential construction and five percent more efficient for non-residential construction.<sup>18</sup> As discussed previously, the Project Site is developed with one single-family residence, one duplex, one studio apartment, and three, two-story apartment buildings. Within the CalEEMod software, building electricity and natural gas usage rates were adjusted to account for prior Title 24 Building Energy Efficiency Standards.

## c) Project Design Features

No specific project design features are proposed with regard to energy infrastructure. However, the Project would include project design features designed to improve energy efficiency as set forth in PDF-AQ-1 in Section IV.B, *Air Quality*, of this Draft EIR. The Project would also implement Project Design Feature PDF-NOI-1 in Section IV.G, *Noise*, of this Draft EIR, which would include the use of solar-powered generators, to the extent feasible, which would promote energy conservation and reduce the burden on existing infrastructure.

<sup>17</sup> California Air Pollution Control Officers Association, California Emissions Estimator Model, 2017, <http://caleemod.com/>. Accessed March 2018.

<sup>18</sup> California Energy Commission, 2016 Building Energy Efficiency Standards Adoption Hearing presentation, June 10, 2015, Available at: [https://www.calbo.org/sites/main/files/file-attachments/2015-06-10\\_adoption\\_hearing\\_presentation.pdf?1520982919](https://www.calbo.org/sites/main/files/file-attachments/2015-06-10_adoption_hearing_presentation.pdf?1520982919). Accessed March 2018.



## d) Analysis of Project Impacts

***Threshold (a): Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***<sup>19</sup>

### (1) Construction

#### (a) Electricity

Heavy construction equipment would generally be powered with diesel fuel. As discussed in detail in Section IV.D, *Energy*, of this Draft EIR, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, to provide electricity for temporary lighting, and for other general 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. When not in use, electric-powered equipment would be powered off so as to avoid unnecessary energy consumption.

During Project construction activities, electricity usage would represent approximately 0.20 percent of the estimated net annual Project operational demand,<sup>20</sup> which as described above, can be served by LADWP's existing electrical supply and infrastructure capacity. Moreover, construction electricity usage would replace the existing electricity usage at the Project Site during construction since the existing on-site uses which currently generate a demand for electricity would be removed. The electricity demand during construction would be completely offset by the removal of the existing on-site uses which currently generate a demand for electricity. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. **Therefore, construction of the Project 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.**

<sup>19</sup> The analysis of water and wastewater infrastructure is provided in Section IV.N-1, *Utilities and Service Systems – Water, Wastewater; and Solid Waste*; the analysis of stormwater drainage is evaluated in Section IV.G, *Hydrology and Water Quality*; and the evaluation of telecommunications infrastructure is evaluated in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

<sup>20</sup> The percentage is derived by taking the annual amount of electricity usage during construction (6,618 kWh) and dividing that number by the total amount of electricity usage during operation (3,382,268 excluding the 30 kW solar photovoltaics) to arrive at 0.20 percent.

With regard to existing electrical distribution lines, the 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 easement 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.**

(b) *Natural Gas*

Construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support Project construction activities; thus, there would be no expected demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to grading/trenching activities in order to place the lines below surface at the Project Site. **Therefore, construction of the Project would not result in an increase in demand for, or an interruption in the delivery of, natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

(2) *Operation*

(a) *Electricity*

Based on LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 26,835 GWh of electricity.<sup>21</sup> As shown in Section IV.D, *Energy*, Table IV.D-2, *Summary of Annual Net New Energy Use During Project Operation*, the Project's operational electricity demand would be 3,382,268 kWh per year (excluding the 30 kW solar photovoltaics), which is approximately 0.013 percent of LADWP's projected sales in fiscal year 2021-2022.<sup>22,23</sup> The Project would include a minimum of 30 kilowatts of photovoltaic

<sup>21</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

<sup>22</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

<sup>23</sup> Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, p. 14, 2017. Available at: [https://ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?\\_adf.ctrl-state=g81pigne3\\_4&ref=akagunduz.com\)&\\_afLoop=80562246862719&\\_afWindowMode=0&\\_afWindowId=p89g8ugvz\\_1#%40%3F\\_afWindowId%3Dp89g8ugvz\\_1%26\\_afLoop%3D80562246862719%26ref%3Dakagunduz.com%2529%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dp89g8ugvz\\_17](https://ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrl-state=g81pigne3_4&ref=akagunduz.com)&_afLoop=80562246862719&_afWindowMode=0&_afWindowId=p89g8ugvz_1#%40%3F_afWindowId%3Dp89g8ugvz_1%26_afLoop%3D80562246862719%26ref%3Dakagunduz.com%2529%26_afWindowMode%3D0%26_adf.ctrl-state%3Dp89g8ugvz_17). Accessed August 29, 2019.

panels on the Project Site, which are estimated to provide approximately 47,478 kWh of electricity per year and would reduce the Project's grid-supplied electricity demand to approximately 3,334,790 kWh.

In addition, during peak conditions, the LADWP power system experienced an all-time high peak of 6,502 MW on August 31, 2017.<sup>24</sup> The 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 2021-2022, the base case peak demand for the power grid is 5,889 MW.<sup>25</sup> The Project would consume 3,382,268 kWh on an annual basis (excluding the 30 kW solar photovoltaics) which is equivalent to approximately 772 kW (peak demand assuming 4,380 hours per year of active electricity demand). In comparison to the LADWP power grid base peak load of 5,889 MW for 2021-2022, the Project would represent approximately 0.013 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.0006 percent in fiscal year 2021-2022 would be sufficient to account for future electrical demand by the Project.<sup>26</sup> The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Therefore, during Project operations, it is expected that LADWP's existing infrastructure and electricity supplies would be sufficient to support the Project's electricity demand. **Based on the required load forecast projections by LADWP, this utility would be expected to meet the Project's demand, and the would not result in an increase in demand for electricity that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

(b) *Natural Gas*

Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates that natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf per day in 2022 (the Project's buildout year), and SoCalGas will have a capacity of approximately 3,775 million cf per day.<sup>27</sup> 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. As shown in Table IV.D-2, the Project would generate a demand of approximately 5,662,999 cf of natural gas per year, which represents approximately 0.0004 percent of the 2022 forecasted capacity in the SoCalGas planning area. SoCalGas expects overall natural gas demand to decline through 2035, even accounting for population and

<sup>24</sup> Los Angeles Department of Water and Power, 2017 Retail Electric Sales and Demand Forecast, p. 6, 2017.

<sup>25</sup> Los Angeles Department of Water and Power, 2017 Retail Electric Sales and Demand Forecast, p. 6, 2017.

<sup>26</sup> Los Angeles Department of Water and Power, 2017 Retail Electric Sales and Demand Forecast, p. 6, 2017.

<sup>27</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 102, 2018. Available at: [https://www.socalgas.com/regulatory/documents/cgr/2018\\_California\\_Gas\\_Report.pdf](https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf). Accessed September 2019.

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 0.74 percent from 2018 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI)."<sup>28</sup> **Based on the Project'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 the Project's operation would not significantly affect the available natural gas supply or distribution infrastructure and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.**

### (3) Conclusion

**As demonstrated in the analysis above, construction and operation of the Project 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. Impacts would be less than significant during construction and operation.**

## e) Cumulative Impacts

### (1) Electricity

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2022-2023 fiscal year will be 26,835 GWh of electricity.<sup>29,30</sup> As stated above, based on the Project's estimated electrical consumption of 3,382,268 kWh/year (excluding the 30 kW solar photovoltaics), the Project would account for approximately 0.013 percent of LADWP's total projected sales for the Project's buildout year. Each related project would be expected to comprise a similarly limited percentage of overall electricity consumption. In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.<sup>31</sup> Therefore, electricity usage resulting

<sup>28</sup> California Gas and Electric Utilities, 2018 California Gas Report, p. 66, 2018. Available at: [https://www.socalgas.com/regulatory/documents/cgr/2018\\_California\\_Gas\\_Report.pdf](https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf). Accessed September 2019.

<sup>29</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

<sup>30</sup> Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, 2017.

<sup>31</sup> LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

from future operations at many of the related projects is likely accounted for in the LADWP projections.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. LADWP would continue to expand delivery capacity as needed to meet demand increased within its service area at the lowest cost and risk, consistent with LADWP's environmental priorities and reliability standards. The 2017 Power Strategic Long-Term Resources Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Although detailed information regarding electrical infrastructure for each of the related projects is not known, it is expected that LADWP would provide for necessary improvements specific to each related project. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their respective projects, thereby contributing to the electrical infrastructure in the Project area. As discussed above, will serve letters are provided for individual projects which determines whether sufficient infrastructure is in place to provide electrical service to the proposed project. As part of the will serve letter process, the LADWP takes into account all uses (including related projects) in the service area ensure that sufficient local and regional infrastructure is adequate. As the will serve letter for the Project identified adequate infrastructure, construction and operation of the Project would not adversely affect the LADWP electrical grid. **As such, the Project's contribution to cumulative impacts with respect to electrical power facilities would not be cumulatively considerable and, thus, would be less than significant.**

## (2) Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2018 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf per day in 2022, the Project's buildout year.<sup>32</sup> The Project would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas' planning area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area, and in general, each related project would be expected to comprise a similarly limited percentage of overall natural gas consumption.<sup>33</sup>

<sup>32</sup> California Gas and Utilities, 2018 California Gas Report, 2018. Available at: [https://www.socalgas.com/regulatory/documents/cgr/2018\\_California\\_Gas\\_Report.pdf](https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf). Accessed September 2019.

<sup>33</sup> KPFF Consulting Engineers, Utility Technical Report: Energy, March 15, 2017. Cited in citizen M Hollywood & Vine Draft EIR, Appendix D.2. State Clearing House No. 2016101009. Available at: [https://planning.lacity.org/eir/citizenM%20Hollywood\\_Vine/DEIR/index.html](https://planning.lacity.org/eir/citizenM%20Hollywood_Vine/DEIR/index.html). Accessed August 29, 2019.

Moreover, SoCalGas' forecasts take into account projected population growth and development based on local and regional plans. Therefore, natural gas usage resulting from future operations at many of the related projects is likely accounted for in the SoCalGas projections.

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvement by SoCalGas occur as needed. It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Although detailed information regarding natural gas infrastructure for each of the related projects is not known, it is expected that SoCalGas would provide for necessary improvements specific to each related project. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Project applicants would be required to provide for then needs of their individual projects, thereby contributing to the natural gas infrastructure in the Project area.

As discussed above, will serve letters are provided for individual projects which determines whether sufficient infrastructure is in place to provide natural gas service to the proposed project. As part of the will serve letter process, SoCalGas takes into account all uses (including related projects) in the service area ensure that sufficient local and regional infrastructure is adequate. As the will serve letter for the Project would not significantly affect the SoCalGas regional infrastructure. **As such, the Project's contribution to cumulative impacts with respect to natural gas facilities would not be cumulatively considerable and, thus, would be less than significant.**

### (3) Conclusion

**Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas) would not result in a cumulatively considerable effect related to available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power and natural gas facilities, the construction of which could cause significant environmental effects. As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy infrastructure impacts under Threshold (a) are concluded to be less than significant.**

#### f) Mitigation Measures

Project-level and cumulative impacts with regards to energy infrastructure would be less than significant. Therefore, no mitigation measures are required.

#### g) Level of Significance After Mitigation

Project-level and cumulative impacts with regard to utilities infrastructure would be less than significant without mitigation.

# Chapter V

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## Alternatives

### 1. Introduction

Under California Environmental Quality Act (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 and is required to ensure the consideration of 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) as follows:

*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 State *CEQA Guidelines* emphasize that the selection of Project alternatives 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.”<sup>1</sup> The State *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.<sup>2</sup>

In selecting Project alternatives for analysis, potential alternatives should be feasible. The State *CEQA Guidelines* Section 15126.6(f)(1) explains 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.*

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<sup>1</sup> CEQA Guidelines Section 15126.6(b).

<sup>2</sup> Ibid., Section 15126.6(f).

The State CEQA Guidelines require the analysis of a “no Project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the Project, if feasible. An environmentally superior alternative is to be identified from among the alternatives evaluated. 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.<sup>3</sup>

Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed Project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the proposed Project. If an alternative would cause one or more significant impacts in addition to those of the proposed Project, analysis of those impacts is to be discussed, but in less detail than for the proposed Project.

## 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 more fully utilize the available capacity on the Project Site to locate mixed-use development in a transit-rich area. The Project Objectives are as follows:

1. To construct an infill development that balances commercial and residential uses by providing a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the Project Site area.
2. To redevelop the underutilized Project Site with an economically viable and attractive transit-oriented high-density mixed-use development that is appropriate for the Project Site’s location in a Transit Priority Area and is consistent with its designation as Regional Center and Hollywood Center.
3. To promote and support local and regional mobility, greenhouse gas and air quality objectives to reduce vehicle miles traveled, reduce reliance on single-passenger vehicles and increase the use of public transit, and maximize infill development by constructing a high-density residential, hotel and commercial/restaurant mixed-use development on a site within a designated Transit Priority Area that is located within one-quarter mile of key public transit facilities, including the Hollywood and Vine Red Line Station.
4. To provide a diverse mix of dwelling units that appeal to a range of household sizes to help meet the critical demand for new housing in the Hollywood Community Plan area.
5. To increase the City’s stock of rent controlled units under the City’s RSO through a project that provides 100 percent of its residential apartment units as RSO units.

<sup>3</sup> CEQA Guidelines, Section 15126.6(e)(2).



6. To provide a right of return for residents of existing onsite residential apartment units subject to the RSO.
7. To support job creation and to increase business opportunities within Los Angeles by developing the Project's hotel and commercial/restaurant uses on a site well-served by transit.
8. To revitalize the streetscape surrounding the Project Site and encourage pedestrian activity and bicycle use by creating a streetscape design that allows for outdoor café tables, parkway planters and bicycle parking within an overall landscape design that integrates the Project development into the surrounding urban neighborhood.

### 3. Alternatives Selected for Analysis

The first alternative selected for analysis is a No Project/No Build Alternative, pursuant to Section 15126.6(e) of the CEQA Guidelines. Under the No Project/No Build Alternative, the Project would not be developed. All of the existing on-site residential uses would remain as under existing conditions.

Three additional alternatives were selected for analysis. Two of the alternatives would change the mix of uses from the Project's primarily hotel/residential mixed use to a primarily residential mixed use (Alternative 2) or to a primarily office mixed use (Alternative 4). One of the alternatives (Alternative 3) would develop the Project Site according to existing "Q" zoning on the East Parcel, which allows one residential unit per 1,200 square feet, and existing "D" limitations on the West and Center Parcels, which allows a floor area ratio (FAR) of 2:1<sup>4</sup>. The latter would not require any zone changes or implement a residential density bonus. The alternatives were selected to determine the effects of different mixes of residential and commercial uses relative to the Project's significant, short-term construction noise and vibration impacts and less than significant operation impacts. The physical characteristics of each alternative are summarized in **Table V-1, Overview of the Analyzed Alternatives**.

- No Project/No Build Alternative
- Primarily Residential Mixed-Use Alternative
- No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative
- Primarily Office Mixed-Use Alternative

<sup>4</sup> The "D" limitation also allows for an increase in FAR with approval by the acting CRA Board (the Los Angeles Department of City Planning).

**TABLE V-1  
OVERVIEW OF THE ANALYZED ALTERNATIVES**

<b>Use</b>	<b>Proposed Project</b>	<b>Alternative 1 No Project/No Build</b>	<b>Alternative 2 Primarily Residential Mixed-Use</b>	<b>Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus Density</b>	<b>Alternative 4 Primarily Office Mixed-Use</b>
Max. Height	Bldg. 1: 20 stories (225') <sup>a</sup> Bldg. 2: 3 stories (34' or 47') [b, c]	No new buildings	Bldg. 1: 20 stories (225') [a] Bldg. 2: 3 stories (34' or 47') [b, c]	One Building: 60 feet (5 stories) at the Project's Building 1 site and 30 feet (3 stories) at the Project's Building 2 site	Building 1: 50 feet (3-4 stories) Bldg. 2: 3 stories (34' or 47') [b, c]
Residential (MF Units)	Building 1: 197 units Building 2: 13 units Total: 210 units	44 units (1 single family and 43 multi-family)	Building 1: 254 units Building 2: 17 units Total: 271 units	101 units over the Project Site	Building 2: 13 units
Commercial/ Restaurant (sq. ft.)	Building 1: 12,570 sf	No commercial uses	Building 1: 5,120 sf.	No commercial uses	Building 1: 112,000 sf (100,000 sf office, 12,000 sf retail/restaurant))
Hotel (Rooms)	Building 1: 136 rooms	No hotel uses	No hotel uses	No hotel uses	No hotel uses
Code-Required Automobile Parking	Building 1: 471 spaces [d] Building 2: 23 spaces	[e]	Building 1: 386 spaces [d] Building 2: 21 spaces	145 spaces [d]	Building 1: 224 spaces [d] Building 2: 26 spaces
Code-Required Bicycle Parking	Building 1: 243 spaces Building 2: 19 spaces	[e]	Building 1: 157 spaces Building 2: 19 spaces	89 spaces	Building 1: 56 spaces Building 2: 19 spaces
Floor Area	Building 1: 300,603 sq. ft. Building 2: 16,345 sf	[e]	Building 1: 300,603 sf Building 2: 16,345 sf	Building 1: 78,843 sf Building 2: 16,345 sf	Building 1: 112,000 sf Building 2: 16,345 sf

**TABLE V-1  
OVERVIEW OF THE ANALYZED ALTERNATIVES**

<b>Use</b>	<b>Proposed Project</b>	<b>Alternative 1 No Project/No Build</b>	<b>Alternative 2 Primarily Residential Mixed-Use</b>	<b>Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus Density</b>	<b>Alternative 4 Primarily Office Mixed-Use</b>
FAR	Averaged over Site: 6:6: 1	[e]	Averaged over Site: 6.6:1	Averaged over Site: 1.98:1	Averaged over Site: 3.81:1

[a] Building height relative to the lowest elevation of the adjacent Argyle Avenue

[b] Building height relative to the elevation of the adjacent Yucca Street

[c] Building height relative to the lowest elevation along adjacent Vista Del Mar Avenue

[d] Does not include allowed reductions for TPA and provision of bicycle parking.

[e] Data not provided for the existing parking spaces or floor area

SOURCE: ESA, 2020.

## 4. Alternatives Considered and Rejected

The State *CEQA Guidelines* Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State *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 as infeasible are discussed below.

### a) Alternative Off-Site Locations

State *CEQA Guidelines* Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed Project, stating that putting the Project in another location should be considered if doing so would allow significant effects of the Project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

The factors that may be considered when addressing the feasibility of an alternative site are 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.

The approximately 1.6-acre Project Site is located within a Transit Priority Area (TPA) along a single city block between Argyle Avenue and Vista Del Mar Avenue. Objectives of the Project are to provide a mix of uses and housing at a density envisioned for the Hollywood Regional Center designation within a City of Los Angeles TPA within a currently underutilized property.

The Project Site is less than 0.2 miles from Metro's Hollywood/Vine Red Line Transit Station. In accordance with Metro's initiatives to spur transit-oriented development around its stations, the Hollywood/Vine station has become a prime target for community regeneration. As discussed in Chapter III, General Description of the Environmental Setting, of the Draft EIR, approximately 137 related projects are proposed for the Project Study Area, many of which are located within the Hollywood/Vine station service area. Considering the development pressure within the TPA, available underutilized 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 Hollywood/Vine Transit Station or currently underutilized.

Regarding the Project's significant and unavoidable construction noise and vibration impacts at nearby residential uses (sensitive receptors), the proximity of

residential uses would also be expected at alternative locations within transit-oriented districts suitable for the Project's scale and density. With the primary Project objective to increase density within the Hollywood/Vine TPA, the Project's construction impacts (impacts on sensitive receptors) at alternative sites would be expected to be similar to those of the Project.

Therefore, because of the improbability of finding an equivalent location that could meet the Project's objectives related to size, density, and proximity to transit in the Hollywood Community, and competition for such locations, it is not expected that the acquisition of an equivalent off-site location would be feasible. Also, because of the objective for proximity to the Metro Station in the context of the area's dense urban character and growth, it is expected that an alternative location that would also be near other residential uses and, thus, result in similar significant construction noise and vibration impacts as at the Project Site. It is not expected that an alternative location would avoid or reduce to less than significant levels the Project's significant and unavoidable construction impacts. Therefore, the development of the Project at an off-site location would not be feasible based on CEQA criteria and an off-site location not given further consideration as a Project Alternative.

## **b) Alternative On-Site Uses**

Development of the Project Site with uses not consistent with the Site's underlying residential or commercial zones, such as light or heavy industrial uses, would not achieve the objectives of the Project and would not be appropriate within the context of the surrounding commercial and residential community. In addition, for the purpose of this analysis, other uses not contemplated or considered as feasible Project Alternatives would be redevelopment of the Project Site with single-family homes. Single-family residential uses would not fulfill any of the Project's objectives to increase density on an underutilized site within a TPA and would result in a net reduction of housing compared to the existing 43 multi-family and one single-family residences on the Project Site. Neither an industrial use nor single-family use would be consistent with the density envisioned for the General Plan's Regional Center and Hollywood Center designations of the Project Site and vicinity. Therefore, alternative uses, such as industrial and single family residences would not meet the primary objectives of the Project and are not considered feasible alternatives to the Project.

## **5. Analysis Format**

In accordance with State *CEQA Guidelines* Section 15126.6(d), 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 in Chapter II 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 net environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where appropriate, the evaluation is divided between temporary impacts that would occur during the Project's construction phase, and impacts that would occur during the Project's operation phase.
- Post-mitigation and non-significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project 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 would be feasible to mitigate to a less than significant level.
- 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.

At the end of the section a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. 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. Section 15126.6(e)(3)(B) of the Guidelines 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 Project Site would continue to operate with one single-family residence, one duplex and a studio apartment, and three, two-story apartment buildings (43

existing multi-family/apartment units total) and associated carports and paved surface parking areas.

## (2) Environmental Impacts

### (a) *Aesthetics/Visual Resources*

Senate Bill (SB) 743 and Zoning Information File No. 2452 (ZI No. 2452) provide that a mixed-use project in a designated urban TPA site is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Although the Project meets this criterion, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, and light/glare.

#### (i) *Views*

Under the No Project/No Build Alternative no new buildings would be constructed and no changes would occur with respect to existing conditions. Views of the Capitol Records Building or other scenic resources across the Project Site are currently available. The Project would not substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views, nor would the Project block panoramic views that occur in the background of open street corridors, such as views of the Hollywood Sign through north-facing streets. Although the Project would not adversely impact views of the Los Angeles Basin and Hollywood from the Jerome D. Daniel Overlook above the Hollywood Bowl or other areas along Mulholland Drive, because the No Project/No Build Alternative would not be visible, it would have no impact on the existing vista compared to the Project. The Project's view impacts would be less than significant under SB 743 and ZI No. 2452, however, because no new buildings would be constructed under the No Project/No Build Alternative, it would be considered to have less impact than under the Project.

#### (ii) *Scenic Resources*

The No Project/No Build Alternative would not result in any changes in the area's scenic resources, including on-site scenic resources. The Project Site is not located along, or within the view field of, a state scenic highway and, with the exception of two small street trees along the Project's Argyle ROW and three palm trees along the Project's Vista Del Mar ROW does not contain scenic resources such as trees or rock outcroppings. The Project Site is located within and adjacent to the Vista Del Mar/Carlos Historic District. Two on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Historic District, are considered to no longer contribute to the scenic historical character of the District. As such, the Project's removal of these buildings would not directly impact a scenic resource. The Project's potential indirect aesthetic impacts on the Historic District would be addressed through the conceptual design of Building 2 which would contain elements that emulate a traditional Prairie style. The Project would maintain a 15-foot setback from Vista Del Mar Avenue, consistent with typical front

yard setbacks along the District's residential street. Overall, the Project Site has limited visual quality and does not contain significant aesthetic or visual resources. Therefore, development of the Project would not substantially damage scenic resources. The Project's impacts on historic resources would be less than significant under SB 743 and ZI No. 2452, however, because no new buildings would be constructed under the No Project/No Build Alternative, it would be considered to have less impact than under the Project.

*(iii) Consistency Regulations that Govern with 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. 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 Hollywood Community Plan. As discussed in this Draft EIR, the Project would comply with street tree requirements and provide exterior lighting in compliance with LAMC regulations, and would comply with the signage requirements of the Hollywood Signage SUD. In addition, the Project 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 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. The Project 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. Through compliance with the LAMC and Hollywood Signage SUD, and consistency with the Hollywood Community Plan, the Project would not conflict with regulations that govern scenic quality, and impacts would be less than significant. However, because the No Project/No Build Alternative would not change any conditions at the Project Site, impacts would be less than under the Project.

*(iv) Visual Character and Quality*

The potential for a project to degrade the existing visual character or quality of public views the site and its surroundings is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

Under the No Project/No Build Alternative, the Project's residential, hotel, and commercial/restaurant uses would not be developed. As a result, no changes in the visual character and quality of the Project Site would occur. Under existing conditions, the on-site multi-family apartment buildings are well-kept, but do not possess significant architectural, historical or otherwise significant aesthetic character. The No Project/No Build Alternative would not provide for the Project's



aesthetic benefits. At present, the Yucca Street frontage is visually dominated by older utility poles and overhead power lines. As provided under PDF-AES-1, the Project would locate all utilities underground. The Project would also replace the chain link-fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue with a landscaped residential use. The Project would create a varied street front with landscaping and street trees, restaurants, and pedestrian and security lighting. However, because the No Project/No Build Alternative would not change existing conditions, it is considered to have less impact than under the Project.

*(v) Light and Glare*

Under the No Project/No Build Alternative, light sources on the site would continue to consist of street lights at the corner of Yucca Street/Vista Del Mar Avenue. Wall-mounted flood lights, which provide little sidewalk lighting, are located at the apartment complex's two gated entrances on Yucca Street and at the single, mid-block driveway. No pole lights are evident in the surface parking area. The Project would introduce new sources of lighting and increase nighttime light. Light sources include security, wayfinding, architectural accent lighting, and lighting associated with the retail/ restaurant uses. The Project would implement PDF-AES-3, which requires that outdoor lighting along streets, rooftops, and courtyards to be placed to minimize visibility from adjacent residential uses, and PDF-AES-5, which requires that building facades be anti-reflective to minimize glare. Implementation of the PDF and LAMC lighting requirements would ensure that potential light and glare would not interfere with the performance of off-site activities or substantially alter the function or character of the surrounding area. The Project's light and glare impacts would be less than significant. However, the No Project/No Build Alternative would not introduce new sources of light and glare and, as such, impacts would be less than under the Project. Pursuant to SB 743 and ZI No. 2452 light and glare impacts would not be considered significant. Although these impacts would be less than significant under the Project, because the No Project/No Build Alternative would not generate any new light and glare, it would have less impact than under the Project.

*(b) Air Quality*

*(i) Consistency with Air Quality Management Plan*

The No Project/No Build Alternative would not involve any new construction or operation of 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. The Project would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. As such, impacts with respect to AQMP consistency would be less than

significant. However, because the No Project/No Build Alternative would not result in any new emissions generation, impacts would be less than under the Project.

*(ii) Violation of Air Quality Standard/Emissions*

(a) Construction

The No Project/No Build Alternative would not involve construction or generate any new criteria pollutants. Conversely, the Project's construction phase has the potential to generate emissions, including toxic air contaminants (TACs), through heavy-duty construction equipment, construction traffic, fugitive dust emissions, paving operation, and the application of architectural coatings and other building materials. With implementation of Mitigation Measure MM-AQ-1, the Project would not exceed the South Coast Air Quality Management District (SCAQMD) numeric thresholds of significance on a short-term basis regional construction emissions. The Project's maximum daily localized construction emissions would not exceed the localized thresholds for CO, NOX, PM10, and PM2.5. Therefore, the Project's localized construction emission impacts on sensitive receptors would be less than significant. Also, the qualitative assessment as well as the health risk modeling concluded that TAC emissions from the Project's construction activities would not expose sensitive receptors to substantial TAC concentrations. Although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations. Therefore, the Project's impact with respect to the violation of an air quality standard and construction emissions would be less than significant after mitigation, as applicable. However, because the No Project/No Build Alternative would not involve any construction activity and is considered to have no impact relative to threshold standards, the No Project/No Build Alternative would have less impact than the Project.

(b) Operation

The No Project/No Build Alternative would not change the existing use of the Project Site and would have no impact with respect to air quality standards. The Project would increase occupancy of the Project Site and operation emissions. The Project's maximum daily net operation emissions, with implementation of PDF-AQ-1 would not exceed the SCAQMD numeric thresholds for air pollutants with regard to regional, localized or TAC emissions, as well as CO Hotspots. PDF-AQ-1 requires reductions in building energy and resource consumption with energy efficient appliances and reduced building energy usage. Because Project operation would not exceed SCAQMD numeric thresholds for these pollutants, operational air quality impacts would be less than significant. However, the No Project/No Build Alternative would not generate any new operation emissions and is considered to have no impact relative to threshold standards. Therefore, impacts

related to air quality standards would be less under the No Project/No Build Alternative than under the Project.

(c) *Cultural Resources*

(i) *Historical Resources*

The No Project/No Build Alternative would not involve any changes in existing buildings or conditions at the Project Site. Conversely, the scale of the Project would contrast with the Vista Del Mar/Carlos Historic District's one- and two-story single-family homes, which could indirectly impact the Historic District. In this regard, the Project's three-story Building 2 would provide a transitional buffer between the Project's 20-story, contemporary tower (Building 1) and the adjacent Historic District. Building 2 would feature a 15-foot setback along Vista Del Mar Avenue and a seven-foot set-back at the south elevation, which would be compatible with the adjacent District contributors. Further, Building 2 would incorporate elements of the Prairie style to support compatibility with the Craftsman-style Historic District contributors. The Project would conform to the Secretary of the Interior's Standards and, as such, the Project's direct or indirect impacts on the Historic District would be less than significant. However, as the No Project/No Build Alternative does not propose any new development, impacts related to historical resources would be less under the No Project/No Build Alternative than under 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. Excavation would be to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending down to approximately 40 feet below ground surface. As such, the Project has the potential to encounter archaeological resources in previously undisturbed soils. With implementation of mitigation measures MM-ARCH-1 through MM-ARCH-3, the Project would provide for appropriate treatment and/or preservation of resources if encountered. Under the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. However, because the No Project/No Build Alternative would involve no excavation, it would have no effect on such resources. Thus, impacts related to archaeological resources would be less under the No Project/No Build Alternative than under the Project.

(d) *Energy*

The No Project Alternative would not involve any development or occupancy of the Project Site. As such, the No Project Alternative would have no impact with respect to new energy demand. The Project would increase demand for electricity, natural gas, and transportation energy, during construction and operation. The Project would increase annual electricity consumption by 3,417,600 kWh per year

(representing approximately 0.013 percent of LADWP's projected sales in 2021) and would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas's planning area. In addition, the Project's mixed use design, location on an infill site in a Transit Priority Area and a High Quality Transit Area in proximity to existing high-quality transit stops, entertainment, and commercial uses, would achieve a reduction in vehicle miles traveled greater than the Hollywood Community Plan, City, and statewide averages.

Also, because the Project incorporates a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand, including consistency with a state and local conservation plans, and would not result in the wasteful, inefficient, or unnecessary consumption of electricity. However, because the No Project/No Build Alternative would not require any increases in energy demand, impacts on energy supplies and infrastructure would be less under this Alternative than under the Project.

(e) *Geology, Soils, and Paleontological Resources*

(i) *Exacerbation of Existing Environmental Conditions*

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. The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault and, as such, requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface displacement from the fault.<sup>5</sup> However, Geotechnical faulting investigations have indicated that no active faulting, including the Hollywood Fault, occurs beneath or projects toward the Project Site.<sup>6</sup> Although the Project Site is subject to potential earthquake ground shaking, implementation of applicable LAMC Chapter IX (Building Code) seismic design provisions would require the latest seismic design standards for structural loads and materials, and accommodate maximum ground accelerations from known faults. Respectively, a design-level geotechnical report, applicable to the Project, will be required to develop geotechnical recommendations for final design, including drilling and sampling geotechnical borings and detailed engineering analyses. With implementation of applicable regulations and recommendations of the geotechnical report, Project impacts with respect to ground shaking would be less than significant. Although the Project Site

<sup>5</sup> Earthquake Fault Zones, Special Publication 42, Interim Revised 2018, prepared by Department of Conservation, California Geological Survey, <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>, accessed October 2018.

<sup>6</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, pages 7-8, March 2019. Contained in Appendix F of this Draft EIR.

is located within an area susceptible to liquefaction,<sup>7</sup> site-specific liquefaction analysis indicates that the Project Site is primarily underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral spreading.<sup>8</sup> Excavation for the subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and California Building Code (CBC) requirements. 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.<sup>9</sup> Application of appropriate engineering controls and compliance with regulations for planned excavation and construction activities would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of 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 the Project's exacerbation of existing environmental conditions. The Project's impacts related to geologic conditions would be less than significant. However, because the No Project/No Build Alternative would not require any new development or earthwork, it would not change existing exposure to geologic conditions and, as such, impacts would be less than under the Project.

*(ii) Soil Erosion or Loss of Topsoil*

The No Project/No Build Alternative would not require any construction activities requiring grading or exposure of soil to rain or wind. Construction of the Project would increase soil exposure and risk of soil erosion. The potential for water erosion 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 National Pollutant Discharge Elimination System (NPDES) General Construction 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 Project 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, impacts due to erosion of topsoil would be less than significant. However, because the No Project/No Build Alternative would not involve any construction activity, impacts with respect to soil erosion would be less under than under the Project.

<sup>7</sup> City of Los Angeles General Plan, Safety Element, Exhibit B (shown in Figure IV.D-5 of this Draft EIR).

<sup>8</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, page 9, March 2019. Contained in Appendix F of this Draft EIR.

<sup>9</sup> Group Delta, Op. Cit., page 9.

### *(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. 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 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 regulations. Recommendations would include a shoring system of soldier piles with internal bracing and/or tied-back anchors and other suitable excavation engineering techniques. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts with respect to unstable geologic units would be less than significant. However, because the No Project/No Build Alternative would not involve any new structures or excavation activity, impacts with respect to unstable geologic units would be less than under 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. Under the Project, the corrosive potential of the soils would be addressed in the Final Geotechnical Report and taken into consideration prior to the installation of all underground metal pipes/clamps/structures. Compliance with standard construction and engineering practices (e.g., onsite excavation requiring suitable engineered stabilization in accordance with the 2016 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. Implementation of these regulations and practices would reduce hazards associated with potential expansive soils or corrosive soils. As such, Project impacts regarding expansive and corrosive soils would be less than significant. However, because the No Project/No Build Alternative would not involve any new structures on the Project Site, it would have less impact with respect to expansive or corrosive soils than under the Project.

### *(v) Paleontological Resources*

The No Project/No Build Alternative would not require any excavation activities that would potentially encounter previously undiscovered archaeological or paleontological resources. Excavation would be to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending

down to approximately 40 feet below ground surface. As such, the Project has the potential to encounter paleontological resources in previously undisturbed soils. In addition, the Project Site contains older Quaternary alluvial fan and fluvial deposits that potentially contain fossil specimens. With implementation of mitigation measures MM-PALEO-1 through MM-PALEO-3, the Project would provide for appropriate treatment and/or preservation of resources if encountered. Under the Project, potentially significant impacts paleontological resources would be mitigated to a less-than-significant level. However, because the No Project/No Build Alternative would involve no excavation, it would have no effect on such resources. Thus, impacts related to paleontological resources would be less under the No Project/No Build Alternative than under the Project.

(f) *Greenhouse Gas Emissions*

The No Project/No Build Alternative would not include the construction of any new buildings, higher occupancy of the Project Site, or other activity that would generate new greenhouse gas (GHG) emissions. The construction and occupation of the Project Site under the Project would increase GHG emissions. The Project's net operation emissions of 3,063 million metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e) would be approximately 22 percent below the Project's net operational emissions that would be generated by the Project under the NAT Scenario. The Project would implement PDF AQ-1 PDF-GHG-1, and PDF-GHG-2 to ensure that GHG emissions would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the City's Green Building Ordinance. With implementation of applicable PDF's, GHG impacts under the Project would be considered to be less than significant. However, because the No Project/No Build Alternative would not involve new construction or a change in GHG emission-producing activity over existing conditions, impacts with respect to GHG emissions would be less than under the Project.

(g) *Hydrology and Water Quality*

(i) *Construction*

The No Project/No Build Alternative would not involve any construction and, as such, would not cause surface or groundwater exposure to pollutants that would violate water quality or waste discharge standards. Conversely, the Project's construction activities, such as earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff or groundwater. Also, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events. On-site water activities for dust suppression could contribute to pollutant loading in runoff from the construction site. However, the Project's potential impacts would be reduced to less-than-significant levels through compliance with the required National Pollutant

Discharge Elimination System (NPDES) permit, which includes a construction Storm Water Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs). BMPs would ensure that the Project would not exceed surface and groundwater water quality standards during construction. BMPs would also control the direction and volume of runoff so that the capacities of existing storm drains would not be exceeded or existing drainage patterns would not be altered. As such, implementation of existing regulations, which include required BMPs, would reduce the Project's hydrology and water quality impacts related to construction to less than significant levels. However, because the No Project/No Build Alternative would not involve any construction, impacts with respect to hydrology and water quality would be less than under the Project.

*(ii) Operation*

The No Project/No Build Alternative would not cause any changes in existing conditions, in which the Project Site has approximately 87 percent impervious surfaces. The Project would result in approximately 3,210 square feet landscaping/pervious areas and approximately 94 percent imperviousness. The Project would implement the City's Low Impact Development (LID) measures, including biofiltration, rainwater harvesting, and infiltration, which would result in an effective change in Q10 runoff of -0.12 cfs, and effective change in Q50 runoff of 0 cfs. As such, the Project would reduce existing runoff from the Project Site. Therefore, compliance with existing LID regulations would ensure that the Project would not alter the existing drainage pattern or increase the rate and amount of surface runoff in a manner that would result in substantial on- or off-site siltation or erosion or flooding. Because no LID controls would be implemented under the No Project/No Build Alternative, the Project would have less impact with respect to off-site drainage and on- and off-site siltation, erosion, and flooding than under the No Project/No Build Alternative. The Project Site is not located within a floodplain or subject to atypical flooding or water quality impacts.

*(h) Land Use and Planning*

The No Project/No Build Alternative would not change the existing land use and occupation of the Project Site. The existing residential uses and zoning designations would remain. Because no changes would occur on the Project Site, the No Project/No Build Alternative would not conflict with any City and regional plans and policies related to avoiding or reducing environmental impacts. The Project would require a zone change to create a higher density and intensity of use, thus generating greater environmental effects than under existing conditions. Although most land use plans do not directly address environmental effects, land use designations are intended to physically organize a community and prevent encroachment of conflicting uses which, thus, would reduce certain environmental effects. The Project would implement the objectives of the General Plan Framework Element with respect to providing a diversity of uses in accordance with the Project Site's Regional Center Designation and concentration of mixed-



use development along a corridor less than 0.25 miles from the Hollywood/Vine Metro Red Line, other public transit, and within walking distance of a broad range of uses to reduce vehicle miles traveled. The Project would also further the policies of the Health and Wellness Element and the Housing Element's anti-displacement and sustainability standards by replacing 44 existing RSO residential units with 210 RSO units and implementing the policies of the 2016 CALGreen Code, the Los Angeles Green Building Code, and LEED building design standards. The Project would provide bicycle parking spaces, increase residential density in proximity to transit, and improve sidewalks and pedestrian safety along Yucca Street, Vista Del Mar Avenue, and Argyle Avenue and would, thus, meet the policies of the Hollywood Redevelopment Plan, the City's Mobility Plan 2035, and SCAG RTP/SCS policies to support and encourage a land use pattern and circulation system that supports pedestrians, bicycles, and mass transit in existing urban environments, thus reducing vehicle miles. Overall, the density and location of the Project 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. The No Project/No Build Alternative would not generate any changes or conflict with any local or regional plans and policies related to new development. However, unlike the Project, this Alternative would not further regional and local policies to provide affordable housing, enhance pedestrian activity, or increase transit use. Nevertheless, because no changes would occur under the No Project/No Build Alternative, impacts would be less than under the Project.

(i) *Noise and Vibration*

(i) *Construction*

The No Project/No Build Alternative would not involve any construction activities and, therefore, it would have no construction noise impacts. Whereas, under the Project, construction activities would require the use of heavy-duty machinery, which would increase noise levels at several sensitive receptor locations in the area. Under the Project, MM NOE-1 would provide for sound barriers that would achieve a noise reduction of 15 dBA, MM-NOI-2, would require equipment noise control, and MM-NOI-3 would maintain a 15-foot setback between large equipment and adjacent, off-site residences, as well as provide for an on-site construction liaison. Although these mitigation measures would result in a substantial reduction in noise and vibration, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at adjacent residential uses along Vista Del Mar Avenue (Location R3), the residential uses to the west across Argyle Avenue (Location R1), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (Location R4), and those on the north side of Yucca Street (Location R2) even after implementation.

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. However, because MM NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable. Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. Because the No Project/No Build Alternative would not involve any construction activity, and would avoid the Project's significant and unavoidable construction noise and vibration impacts, construction noise and vibration impacts would be less than under the Project.

*(ii) Operation*

Occupation and activity at the Project Site would not change under the No Project/No Build Alternative. Occupation of the Project Site under the Project would increase traffic and composite noise levels. The Project's composite and operation noise and vibration impacts were concluded to be less than significant after implementation of MM-NOISE-5, which would require a sound enclosure or equivalent noise-attenuating features around the emergency generator. In addition, Project-related off-site traffic noise increases (mobile noise) would not exceed the City's noise standards. As such, the Project's operation noise impacts would be less than the applicable threshold and therefore less than significant. Although the Project's operation noise and vibration impacts would be less than significant, because the No Project/No Build Alternative would involve no additional operation use of the Project Site or generate off-site traffic noise, impacts under this Alternative would be less than under the Project.

*(j) Population and Housing*

Under the No Project/No Build Alternative, no existing residential units would be removed and additional residential, hotel, and commercial/restaurant uses would not be developed on the Project Site. The existing residential uses would remain on the Project Site. Thus, the No Project/No Build Alternative would not require relocation of existing tenants or introduce new residents, workers, and visitors to the Project Site.

In contrast, the Project would provide 210 residential units (a new increase of 166 units) and generate approximately 03 new residents,<sup>10</sup> and 99 new employees. It would also temporarily displace the tenants from the existing 44 units. Impacts from the Project's new residents and employment opportunities would be less than significant because they would be consistent with SCAG's growth projections, would help the City meet its housing obligation under the Southern California Association of Governments (SCAG) Regional Housing Needs Assessment (RHNA) allocation, and would provide the type of transit oriented development encouraged in the Los Angeles General Plan and SCAG RTP/SCS policies. With the Project's net increase of dwellings units, the number of dwelling units that would be temporarily removed represents a small fraction of the housing growth expected Citywide and would not represent the displacement of a substantial number of existing housing such that the construction of replacement housing elsewhere would be required. As such, the Project would result in a less than significant population and housing impact. However, the No Project/No Build Alternative would have no impact relative to population and housing or housing displacement. Therefore, the No Project/No Build Alternative is considered to have less impact than under the Project.

(k) *Public Services*

(i) *Fire Protection*

The No Project/No Build Alternative would not cause any changes in activity or occupation of the Project Site that would increase demand for fire protection and emergency medical services. 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. The Project would implement PDF-TRAF-1, to provide a Construction Management Plan to improve access around the construction site. PDF-FIRE-1 would facilitate occupants' voluntary fire and emergency medical procedures during operation that would reduce demand on the LAFD. The Project would also comply with Fire Code regulations related to mixed use and a 20-story building. With the implementation of PDFs and applicable regulations, the Project would not increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, the Project would not result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection would be less than significant. However, the No Project/No Build Alternative would not result any new demand fire protection and emergency medical services and, as such, would have less impact than under the Project.

<sup>10</sup> Based on the citywide household size of 2.43 persons per household. The Project's 210 dwelling units would generate a direct population increase of approximately 510 new people. The existing 44 residential units have an estimated population of approximately 107 residents (510 new residents – 107 existing residents = 403 residents).

*(ii) Police Protection*

The No Project/No Build Alternative would not change existing conditions or increase the level of activity at the Project Site and therefore would not alter demand for police protection services or affect emergency response times. In contrast, the Project would result in construction and operation activities that could affect emergency access and increase demand for police protection services. The Project would result in a net increase in the LAPD service population of 740.<sup>11</sup> This represents an increase in population from 165,000 residents to 165,740 residents in the Hollywood Community Police Station service area, and would reduce the officer to resident ratio from one officer per 468 residents to one officer per 471 residents, assuming no additional officers are hired. Based on a generation factor of 16 crimes per 1,000 residents, the Project could potentially result in approximately 12 additional crimes per year. The Project would implement PDF-POL-1 to increase security and reduce vandalism during construction, and PDF-POL-1 through PDF-POL-5, to provide security personnel and cameras, design landscaping to not impede visibility, require participation in community crime prevention efforts, and to provide building diagrams to the LAPD during operation. These measures would reduce the Project's demand on police services. With the implementation of these features, the Project 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, the Project would not result in potential physical impacts associated with construction of police facilities. Therefore, impacts with respect to police protection would be less than significant. However, the No Project/No Build Alternative would not result in any new demand for police protection services, and as such, would have less impact than under the Project.

*(iii) Schools*

The No Project/No Build Alternative would not generate additional 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. In contrast, the Project would generate a net increase of approximately 52 new school aged children who would attend local schools. The additional students from the Project 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

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<sup>11</sup> Based on City CEQA Thresholds Guide, K. Police Service Population Conversion Factors of 3 persons per residential unit, 3 persons/1,000 sf of retail, and 1.5 persons/hotel room/day.

impacts.<sup>12</sup> As such, the Project's impacts to school facilities and services would be less than significant. However, because the No Project/No Build Alternative would not generate any additional school-age children or cause an increase in demand for schools compared to existing conditions, impacts with respect to school capacity would be less than under the Project.

#### *(iv) Parks and Recreation*

The No Project/No Build Alternative would not result in a residential population increase that would increase the demand for parks and recreation services. In contrast, the Project would generate approximately 403 new residents, who would increase demand for parks and recreational facilities. The Project would incorporate open space in excess of Code standards, including the amenities such as the 4<sup>th</sup> Level pool and spa deck; the podium courtyard, which would be equipped with lounge seats, a gaming lounge, gas fire pit and lounge, BBQ, and dining tables and chairs; a gym; and roof garden. Due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. The Project would comply with LAMC Section 21.10.3 regarding a dwelling unit construction tax of \$200 for each new residential unit for City acquisition of new park space. Furthermore, the Project would meet the applicable requirements set forth in LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space and parkland requirements. Although the Project would not meet the parkland provision goals set forth in the Public Recreation Plan, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, Project operation 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. Impacts with respect to parks and recreation would be less than significant. However, since the No Project/No Build Alternative would not directly or indirectly generate new residents, no impacts to park facilities would occur and impacts would be less than those under the Project.

#### *(v) Libraries*

The No Project/No Build Alternative would not result in an increase in residential or employee population that would increase demand for library services. The Project would increase demand for library services. However, all of the Project's residential units would be equipped to use individual internet service, which provides information and research capabilities that studies have shown reduce demand at

<sup>12</sup> 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."

physical library locations.<sup>13,14</sup> In addition, the Project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. Based on the above, target service populations, and library sizing standards, operation of the Project would not create any new exceedance of the capacity of local libraries to adequately serve the proposed residential population. Therefore, the Project 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. The Project's impacts on libraries would be less than significant. However, because the No Project/No Build Alternative would not generate an increase in demand for library services compared to existing conditions, impacts relative to libraries would be less under the No Project/No Build Alternative than under the Project.

(I) *Transportation*

(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 or implement any objectives related to the circulation system, transit, roadways, or bicycle and pedestrian facilities. The Project would support multimodal transportation options and a reduction in vehicle miles traveled (VMT), as well as promote transportation-related safety in the Project area. The Project would not conflict with policies of the Mobility Plan 2035 adopted to protect the environment and reduce VMT. The Project would also be consistent with applicable transportation goals of the Hollywood Community Plan Objective 6 to coordinate land use densities and to promote the use of transit. Mitigation Measure TRAF-1 under the Project would implement a Transportation Demand Management (TDM) Program to address trip reduction and use of alternate modes of transportation. The Project would not conflict with VisionZero to reduce traffic-related deaths or with LADOT MPP, Section 321, regarding driveway design standards. 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. The Project would include bicycle parking spaces for residents, employees, and visitors. The Project would not conflict with programs, plans, ordinances or policies addressing the circulation system,

<sup>13</sup> Denise A. Troll, Distinguished Fellow, Digital Library Foundation, How and Why are Libraries Changing?, January 9, 2001.

<sup>14</sup> Carol Tenopir, Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies, August 2003.

including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant. However, the No Project/No Build Alternative would neither implement nor conflict with any such plan objectives and, as such would have no impact. Therefore, the No Project/No Build Alternative would have less impact than under 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 vehicle VMT over existing conditions. Based on proposed land uses and floor areas, the Project would generate 12,607 daily VMT, resulting in a household per capita VMT of 7.4 and work VMT of 7.2 per employee. The household per capita rate would be above the threshold of significance for the Central Area Planning Commission (APC) of household per capita of 6.0 while the work VMT would be below the threshold of significance of 7.6. per employee. However, the Project would incorporate MM-TRAF-1, which requires the development and implementation of a TDM Program that would reduce VMT through the use of unbundled parking and incentives and promotions for the use of alternate modes of transportation. With the implementation of MM-TRAF-1, the household per capita VMT would be reduced to 6.0 and the impact would be less than significant with respect to CEQA Guidelines Section 15064.3(b). However, because the No Project/No Build Alternative involves no new development to generate any vehicle miles over existing conditions, impacts would be less than under the Project.

*(iii) Design Hazards*

No new driveways or sidewalks improvements would be developed under the No Project/No Build Alternative. The Project would reduce existing curb cuts, provide new sidewalks around the perimeter of the Project Site. Total existing curb cuts would be reduced from five to three. 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. The Project would not substantially increase hazards, vehicle/pedestrian 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 and streetscape and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant. However, because the No Project/No Build Alternative involves no new development to generate any new vehicles or pedestrians over existing conditions, impacts would be less than under the Project.

*(iv) Emergency Access*

The No Project/No Build Alternative would not change any existing conditions that would affect 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. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project. Under the 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. With review and approval of Project Site access and circulation plans by the LAFD, the Project would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts would be less than significant. However, because the No Project/No Build Alternative would not result in any change to emergency access or increase activity in and around the Project Site, no impact would occur. Thus, impacts regarding emergency access would be less under the No Project/No Build Alternative than under the Project.

*(m) Tribal Cultural Resources*

No Project/No Build Alternative would involve any development that would require excavation or change existing conditions at the Project Site. With regard to the Project, the City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment indicated no known Tribal cultural resources within the Project Site or surrounding area. However, excavations associated with the Project could have a potential, albeit a low potential, to encounter previously unknown and buried Tribal cultural resources. In the unlikely event that buried Tribal cultural resources are encountered during construction, 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, the Project would not cause an impact to known Tribal cultural resources. However, because the No Project/No Project Alternative would not involve any disturbance of the Project Site, impacts would be less than under the Project.

*(n) Utilities and Service Systems – Water, Wastewater, and Solid Waste**(i) Water Supply*

The No Project/No Build Alternative would not construct new buildings or add population at the Project Site; therefore, water demand for this Alternative would be consistent with the existing operation of the on-site residential uses and no impact would occur. In contrast, the Project would increase on-site water demand



by approximately 62,995 gpd or approximately 67.13 acre feet per year (AFY).<sup>15</sup> Water infrastructure and water supply are sufficient to meet Project demand without mitigation; and the Project impact on the provision of water services would be less than significant. However, because no new demand would occur under the No Project/No Build Alternative, impacts would be less than under the Project.

*(ii) Wastewater*

The No Project/No Build Alternative would not construct new buildings or add population at the Project Site; therefore, wastewater demand for the No Project/No Build Alternative would be consistent with the existing operation of the on-site residential uses and no impact would occur. Existing wastewater generation is approximately 6,080 gpd. No Project/No Build Alternative would not generate additional wastewater or increase demand on the existing Hyperion Treatment Conveyance System or Hyperion Treatment Plant. In contrast, the Project is estimated to increase on-site wastewater generation by approximately 62,995 net gpd (69,075 gpd under the Project minus 6,080 gpd generated by existing uses).<sup>16</sup> The Project's additional wastewater would be within the capacity limits of the conveyance and treatment facilities serving the Project Site, and impacts would be less than significant. However, because no new demand would occur under the No Project/No Build Alternative, impacts would be less than those of the Project.

*(iii) Solid Waste*

The No Project/No Build Alternative would not construct new buildings or add population at the Project Site; therefore, solid waste generation for this Alternative would be consistent with the existing operation of the on-site residential uses. This Alternative would not increase solid waste generation at the Project Site that would need to be landfilled and no impact would occur. In contrast, Project construction would generate an estimated 4,308 net tons of construction and demolition (C&D) waste. This 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 would be less than significant. However, because no demolition or construction would occur under the No Project Alternative, it is considered to have less impact with respect to construction waste than under the Project.

Assuming a diversion rate of 76.4 percent, during the Project's operation phase, the Project would generate a net increase of 622 pounds per day and 113.55 tons of solid waste per year. The Project's additional solid waste generation would be accommodated by landfills with adequate capacity to serve the Project and, as such, impacts would be less than significant. However, because no new demand

<sup>15</sup> See Table IV.N.1-8, *Estimated Domestic Water Demand for Project*, in Section IV.N.1 of this Draft EIR.

<sup>16</sup> See Table IV.N.1-7, *Wastewater Generated During Operation*, in Section IV.N.1 of this Draft EIR.

would occur under the No Project/No Build Alternative, impacts with respect to operational solid waste would be less than those of the Project.

(o) *Utilities and Service Systems – Energy Infrastructure*

The Project 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 impacts related to energy supplies and infrastructure capacity would be less than significant during construction and operation. However, because the No Project/No Build Alternative would not require any increases in energy demand, impacts on energy supplies and infrastructure would be less under this Alternative than under 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 residential 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's development objectives.

**b) Alternative 2: Primarily Residential Mixed-Use**

(1) Description of the Alternative

The Primarily Residential Mixed-Use Alternative (Alternative 2) would include the two buildings (Buildings 1 and 2) and the same floor area as under the Project. Building 1 would contain approximately 300,603 square feet of floor area and Building 2 would contain approximately 16,345 square feet of floor area. As with the Project, Alternative 2 would result in an FAR of 6.6:1. Building heights and mass, including the 20-story Building 1 (225 feet in elevation) and three-story Building 2 (47 feet maximum elevation) would be the same under both the Project and Alternative 2. The purpose of this Alternative is to determine whether the elimination of the hotel use and reduction in commercial floor area would reduce the Project's VMT (mitigated to less than significant levels).

Alternative 2 would increase the Project's residential units from 210 units to 271 units, eliminate all hotel rooms, and reduce the Project's commercial/restaurant floor area from 12,570 square feet to 5,120 square feet. Building 1 would provide 254 residential units and Building 2 would provide 17 residential units.

The combined mix of residential units in both Building 1 and Building 2 would consist of 132 one-bedroom units, 96 two-bedroom units, and 26 suites (2 bedroom units). All residential units would comply with the RSO.

Alternative 2 would provide approximately 369 automobile parking spaces (348 in Building 1 and 21 in Building 2), compared to a total of 436 spaces (415 spaces in Building 1 and 21 spaces in Building 2) required for the Project.<sup>17</sup> Alternative 2 would also require 158 long-term bicycle parking spaces (141 spaces in Building 1 and 17 spaces in Building 2) and 18 short-term bicycle spaces (16 spaces in Building 1 and 2 spaces in Building 2). LAMC required parking for Alternative 2 is outlined in **Table V-2, Alternative 2 Code-Required Automobile and Bicycle Parking**, below. Parking for Building 1 would be located in a subterranean structure, accessed via driveways from Yucca Street and Argyle Avenue, whereas, parking for Building 2 would be located below that structure and accessed from Vista Del Mar Avenue.

Under both the Project and Alternative 2, above-grade levels for Building 1 are known as Levels 1 through 20, with Levels 1 through 3 forming the Podium structure. The residential tower would comprise Levels 4 through 20, a section of which would be set back 36 feet, 10 inches from the Yucca Street frontage and 16 feet from the south edge of the Project Site. Below-grade levels are known as Levels P1 through P3. Parking would be located within Levels P1 and P3, with some parking in the south (back) edges of Levels 1 through 3 (the Podium). Vehicle parking in Building 1 would be reduced from 415 spaces under the Project to 386 spaces under Alternative 2. Building 1 would also include 157 bicycle parking spaces, compared to 243 spaces under the Project. As with the Project, parking facilities would be accessed via a single driveway on Argyle Avenue and a single driveway on Yucca Street. The P1 parking level would also incorporate approximately 1,400 square feet of restaurant uses at the corner of Argyle Avenue and Yucca Street. Approximately 2,720 square feet of commercial uses would be located on Level 1 along the Yucca Street frontage.

Building 2 would provide 21 underground vehicle parking spaces and 19 bicycle parking spaces. A single driveway would be located on Vista Del Mar Avenue. Because of the drop in elevation toward the south, the parking structure would be below grade in the north sector of the Project Site along the Vista Del Mar Avenue and daylight in the south sector. Respectively, Building 2 would measure 34 feet to the top of the roof gable relative to Vista Del Mar Avenue in the north sector of the Project Site and measure to 47 feet relative to Vista Del Mar Avenue in the south sector of the Project Site due to Vista Del Mar's drop in elevation toward the south.

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<sup>17</sup> The parking spaces provided for the Project and Alternative 2 reflect reductions allowed under the LAMC for inclusion of bicycle parking.

**TABLE V-2**  
**ALTERNATIVE 2 CODE-REQUIRED AUTOMOBILE AND BICYCLE PARKING**

Unit Type	Factor	Number of Units or Floor Area	Required Parking
<b>Automobile Parking Building 1:[a]</b>			
One-bedroom	1 space per unit	132	132 spaces
Two-bedroom	2 spaces per unit	95	190 spaces
Suite (2-bedroom)	2 spaces per unit	27	54 spaces
Commercial Parking	1 space/500 sf	5,120 sf	10 spaces
<b>Building 1 Subtotal:</b>			<b>386 spaces</b>
<b>Reduction for Inclusion of Bicycle Parking</b>	<b>10% Reduction (38- space reduction)</b>		<b>348 spaces</b>
<b>Automobile Parking Building 2:</b>			
One-bedroom	1 space per unit	13	13 spaces
Two-bedroom	2 spaces per unit	4	8 spaces
<b>Building 2 Subtotal:</b>			<b>21 spaces</b>
<b>Reduction for Bike Parking Replacement</b>			<b>3 spaces</b>
<b>Building 2 Parking after Reduction</b>			<b>18 spaces</b>
			<b>(21 spaces to be provided)</b>
<b>Total Code Parking (Bldg's 1 and 2)</b>			<b>407 spaces</b>
<b>Total Parking after Bike Parking Reduction</b>			<b>369 spaces</b>

Bicycle Parking:[b]	Long-Term Factor	Long Term Spaces	Short-Term Factor	Short-Term Spaces	Total spaces
<b>Bicycle Parking Building 1:[b]</b>					
Up to 25 units	1 space per unit	25	1 space per 10 units	2	27 spaces
26-100 units	1space per 1.5 units	50	1 space per 15 units	5	55 spaces
101-200 units	1 space per 2 units	50	1 space per 20 units	5	55 spaces
200+	1 space per 4 units	13	1 space per 40 units	1	14 spaces
Commercial	1 space per 2,000 sf	3	1 space per 2,000 sf	3	6 spaces
<b>Building 1 Bicycle Parking:</b>		<b>141</b>		<b>16</b>	<b>157 spaces</b>
<b>Building 2:</b>					
Up to 25 units	1 space per unit	17 spaces	1 space per ten units	2	19 spaces
<b>Building 2 Bicycle Parking:</b>		<b>17</b>		<b>2</b>	<b>19 spaces</b>

[a] Per LAMC Sec. 12.21.A.4

[b] Per LAMC Sec. 12.21.A.16(a)(l)(i)

SOURCE: ESA, 2020

Building 1 would provide a total of approximately 32,940 square feet of open space, which would exceed the LAMC requirement of 29,750 square feet. Open space would include 6,300 square feet of podium courtyard, 2,560 square feet of rear yard open space, 6,100 square feet of roof garden and pool deck, and 7,290 square feet of amenities. Building 1 would also provide 10,700 square feet in private balconies. Building 2 would provide 1,800 square feet of open space, including 1,100 square feet of roof garden, 450 square feet of amenities, and 250 square feet in private balconies, consistent with LAMC requirements.

Building 1 would have 16-foot setback along its south edge and Building 2 would have 15-foot setback along Vista Del Mar and 6-foot setback along its south property line.

The requested actions for Alternative 2 would include a Zone Change and Height District Change, as under the Project.

## (2) Environmental Impacts

### (a) *Aesthetics/Visual Resources*

Senate Bill (SB) 743 and Zoning Information File No. 2452 (ZI No. 2452) provide that a mixed-use project in a designated urban TPA site is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Although the Project meets this criterion, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, and light/glare.

#### (i) *Views*

Both the Project and Alternative 2 have the same building height and mass. Neither the Project nor Alternative 2 would substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views. Neither would block panoramic views that occur in the background of open street corridors (such as views of the Hollywood Sign through north-facing Gower Street). No views of the Capitol Records Building or other scenic resources are available across the Project Site. As with the Project, Alternative 2 would be visible from the Jerome D. Daniel Overlook above the Hollywood Bowl and other areas along Mulholland Drive with views across the Los Angeles Basin. Also, as with the Project, Alternative 2 would not block views of scenic vistas in the Los Angeles Basin, such views of the downtown Los Angeles high-rise cluster or horizon. No existing views across the Project Site of the Capitol Records Building or other scenic resources are available and, as such, Alternative 2 would not impact views of these resources. Because of similar building height and mass, impacts would be similar and less than significant under both the Project and Alternative 2. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.

*(ii) Scenic Resources*

The Project Site is not located along, or within the view field of, a state scenic highway and, with the exception of two small street trees along the Project's Argyle Avenue right-of-way (ROW) and three palm trees along the Project's Vista Del Mar ROW does not contain scenic resources such as trees or rock outcroppings. The Project Site is located within and adjacent to the Vista Del Mar/Carlos Historic District. Two on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Historic District, are considered to longer contribute to the scenic historical character of the District. As such, removal of these buildings would not directly impact a scenic resource. Potential indirect aesthetic impacts on the Historic District would be addressed through the conceptual design of Building 2 which would emulate a traditional Prairie style consistent with the District's Craftsman design. Both the Project and Alternative 2 would maintain a 15-foot setback from Vista Del Mar Avenue, consistent with typical front yard setbacks along the District's residential street. Overall, the Project Site has limited visual quality and does not contain significant aesthetic or visual resources. Therefore, development under either the Project or Alternative 2 would not substantially damage scenic resources, including historical buildings, that contribute to the area's scenic value. Impacts under both the Project and Alternative 2 would be less than significant and similar. Furthermore, with the exception of aesthetic impacts on historic scenic resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not considered significant pursuant to SB 743 and ZI No. 2452.

*(iii) Consistency Regulations that Govern with 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. The Project and Alternative 2 would comply with the City's street tree requirements and comply with exterior lighting in compliance with LAMC regulations, and would comply with signage regulations set forth under the Hollywood Signage SUD. In addition, the Project and 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 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. The Project and 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, because neither the Project nor Alternative 2 would conflict with the LAMC, Hollywood Signage SUD, or the applicable Community Plan open

space policy, impacts would be less than significant and similar under the Project and Alternative 2.

*(iv) Visual Character and Quality*

The potential for a project to degrade the existing visual character or quality of public views the site and its surroundings is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

Both the Project and Alternative 2 would change the visual character of the area with the introduction of a new 20-story tower (Building 1) and three-story (47-foot-high) residential building (Building 2). Under existing conditions, the on-site multi-family apartment buildings are well-kept, but do not possess significant architectural, historical or, otherwise, significant aesthetic character. At present, the Yucca Street frontage is visually dominated by older utility poles and overhead power lines. Adjacent sidewalks are in disrepair and the street lacks amenities such as street trees and security/ pedestrian lighting that would support pedestrian traffic along Yucca Street between Vista Del Mar Avenue and Argyle Avenue. Both the Project and Alternative 2 would replace the chain link-fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue with a landscaped residential use and implement PDF-AES-1 and PDF-AES-2. PDF-AES-1 would require overhead utility lines to be located underground and PDF-AES-2 would require construction fencing to reduce visual impacts of the Project's construction site. Both the Project and Alternative 2 would create a varied street front with landscaping and street trees, restaurants, improved sidewalks, pedestrian and security lighting. The 20-story tower would be separated from Vista Del Mar Avenue by the three-story Building 2, which would buffer and reduce contrast between Building 1 and the Vista Del Mar Avenue/Carlos Street Historic District. In addition, the contemporary adaption of the traditional Prairie style in Building 2 would serve as a compatible design transition with the architectural character of the Vista Del Mar/Carlos residential neighborhood. Therefore, neither the Project nor Alternative 2 would substantially degrade the existing visual character or quality of the site and its surroundings. Impacts would be less than significant and similar.

*(v) Light and Glare*

Both the Project and Alternative 2 would introduce new sources of lighting and increase nighttime light levels. Light sources include security, wayfinding, architectural accent lighting, and lighting associated with the retail/restaurant uses. Both the Project and Alternative 2 would implement PDF-AES-3, which requires that outdoor lighting along streets, rooftops, and courtyards to be placed to minimize visibility from adjacent residential uses. In addition, Both the Project and Alternative 2 would implement PDF-AES-5 to require that building facades be anti-reflective to minimize glare. Implementation of the PDF and other LAMC lighting



regulations would ensure that potential light and glare would not interfere with the performance of off-site activities or substantially alter the function or character of the surrounding area. Light and glare Impacts under both the Project and Alternative 2 would be less than significant. However, because Alternative 2 would eliminate the Project's hotel use, any illuminated signage associated with the hotel would be eliminated and light and glare impacts would be incrementally less. Pursuant to SB 743 and ZI No. 2452 light and glare impacts would not be considered significant.

*(b) Air Quality*

*(i) Consistency with Air Quality Management Plan*

The Project and Alternative 2 would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during construction, including compliance with SCAQMD Rule 403, CARB off-road diesel standards, L.A. Green Building Code, Air Pollutions Control Officers Association (CAPCOA) recommendations, and Green Building Measures under PDF-AQ-1. Both the Project and Alternative 2 would be consistent with the applicable growth projections and control strategies used in the development of the AQMP, and would not jeopardize attainment of the air quality levels identified in the Plan. During operation, both the Project and Alternative 2 would incorporate control strategies set forth in the AQMP such as location efficiency, increased density, transit accessibility, improved development design, and other measures. Both the Project and Alternative 2 would be consistent with the City's growth projections and policies of the General Plan Air Quality Element for achieving emission reduction goals. As such, impacts with respect to consistency with AQMP and General Plan air quality policies would be less than significant and similar under both the Project and Alternative 2.

*(ii) Violation of Air Quality Standard/Emissions*

*(a) Construction*

Both the Project and Alternative 2's construction phases have the potential to generate emissions, including TACs, through the use of heavy-duty construction equipment, generation of construction traffic, fugitive dust emissions, paving operations, and the application of architectural coatings and other building materials. Both the Project and Alternative 2 would implement Mitigation Measure MM-AQ-1 to require off-road diesel-powered equipment to meet the CARB and USEPA Tier 4 Final standards and to use pole power to the extent feasible, which would reduce potentially significant regional construction impacts to a less than significant level. As with the Project, Alternative 2's maximum daily localized construction emissions would not exceed the localized thresholds for CO, NOX, PM10, and PM2.5. Therefore, similar to the Project, localized construction emission impacts under alternative 2 on sensitive receptors would be less than

significant. Also, the qualitative assessment as well as the health risk modeling concluded that TAC emissions from the Project's construction activities would not expose sensitive receptors to substantial TAC concentrations. Although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations. Similar to the Project, Alternative 2 would not expose sensitive receptors to substantial TAC concentrations. However, Alternative 2 would incrementally reduce the Project's total parking spaces and, as such, reduce the extent of excavation required for the Project's parking levels. Therefore, Alternative 2 would result in incrementally less excavation and impacts related to dust and equipment emissions would be incrementally less than under the Project.

(b) Operation

The Project and Alternative 2, both of which would generate stationary and mobile emissions during operation, would implement PDF-AQ-1. PDF-AQ-1 requires energy efficiency features, such as reductions in building energy and resource consumption with energy efficient appliances and reduced building energy usage sufficient to meet the applicable Title 24 standard. Reductions include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content. With implementation of PDF-AQ-1, maximum daily net operational emissions, under either the Project or Alternative 2 would not exceed the SCAQMD numeric thresholds for air pollutants. Because neither the Project nor Alternative 2 would exceed SCAQMD numeric thresholds for air pollutants with regard to regional, localized or TAC emissions, as well as CO Hotspots, operational air quality impacts would be less than significant. However, because Alternative 2 would generate incrementally fewer mobile emissions (Alternative 2 would generate 6,585 total daily VMT versus the Project, which would generate 11,929 total daily VMT), impacts related to air quality standards/emissions would be less under the Alternative 2 than under the Project.

(c) Cultural Resources

(i) Historical Resources

Both the Project and Alternative 2 would demolish two on-site buildings located within the Vista Del Mar/Carlos Historic District. These buildings, however, are not considered contributors to the Historic District and demolition of such is not considered to destroy or alter any primary character-defining features of the Historic District. However, the scale of the Project and Alternative 2 would contrast with the Historic District's one- and two-story single-family homes, and has the potential to indirectly impact the Historic District. In this regard, the Project and Alternative 2's three-story Building 2 would provide a transitional buffer between the 20-story, contemporary tower (Building 1) and the adjacent Historic District. Further, Building 2 would incorporate elements of the Prairie style to support

compatibility with the Craftsman style Historic District contributors. Both the Project and Alternative 2 would conform with Secretary of the Interior's Standards for Rehabilitation No. 9 to provide for differentiation and compatibility of massing, size, scale, and architectural features and Standard No. 10 to undertake new development in such a manner that if removed in the future, the essential form and integrity of the Historic District and its environment would be unimpaired.<sup>18</sup> With consistency with these standards, the Project and Alternative 2 would result in similar and less than significant direct or indirect impacts on the Historic District.

(i) *Archaeological Resources*

Excavation for both the Project and Alternative 2 would be to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending to approximately 40 feet below ground surface. As such, both the Project and Alternative 2 have the potential to encounter archaeological resources in previously undisturbed soils. Both the Project and Alternative 2 would require the implementation of mitigation measures MM-ARCH-1 through MM-ARCH-3. These mitigation measures would provide for appropriate treatment and/or preservation of resources if encountered. Under either the Project or Alternative 2, potentially significant impacts to archaeological resources would be mitigated to levels that are less than significant. However, Alternative 2 would reduce the Project's automobile parking space in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, potentially reduce the extent of excavation required for the Project's parking levels. Therefore, impacts related to excavation and the discovery of archaeological resources would be less than under the Project.

(d) *Energy*

Both Alternative 2 and the Project would increase demand for electricity, natural gas, and transportation energy, during construction and operation. The Project would increase annual electricity consumption by 3,417,600 kWh per year (representing approximately 0.013 percent of LADWP's projected sales in 2021) and would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas's planning area. Acknowledging that the Project and Alternative 2 would have a similar floor area, but with varied uses, Alternative 2's energy demand and energy conservation features would not be materially different from the Project such that it would cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. As with the Project, impacts related to efficient energy consumption would be less than significant. The location of the Project and Alternative 2 on an infill site in a Transit Priority Area and a High Quality Transit Area and in proximity to existing high-quality transit

<sup>18</sup> ESA, *Historical Resources Assessment and Environmental Impacts Analysis for 6220 West Yucca Street Project*, August 2019, page 88, contained in Appendix D of this Draft EIR.

stops, entertainment, and commercial uses, would achieve a reduction in VMT greater than the Hollywood Community Plan, City, and statewide averages.

Also, because both the Project and Alternative 2 would incorporate a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand, neither would conflict with applicable state and local conservation plans. Thus, 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 Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 2 would be similar to the Project.

(e) *Geology, Soils, and Paleontological Resources*

(i) *Exacerbation of Existing Environmental Conditions*

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault and, as such, requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface displacement from the fault.<sup>19</sup> However, Geotechnical faulting investigations have indicated that no active faulting, including the Hollywood Fault, occurs beneath or projects toward the Project Site.<sup>20</sup> Although the Project Site is subject to potential earthquake ground shaking, implementation of applicable LAMC Chapter IX (Building Code) seismic design provisions would require the latest seismic design standards for structural loads and materials, and accommodate maximum ground accelerations from known faults. Respectively, a design-level geotechnical report, applicable to either the Project or Alternative 2, will be required to develop geotechnical recommendations for final design, including drilling and sampling geotechnical borings and detailed engineering analyses. With implementation of applicable regulations and recommendations of the geotechnical report, impacts with respect to ground shaking under either the Project or Alternative 2 would be less than significant. The Project Site is located within an area susceptible to liquefaction.<sup>21</sup> However, site-specific liquefaction analysis indicates that the Project Site is primarily underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral

<sup>19</sup> Earthquake Fault Zones, Special Publication 42, Interim Revised 2018, prepared by Department of Conservation, California Geological Survey, <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>, accessed October 2018.

<sup>20</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, pages 7-8, March 2019. Contained in Appendix F of this Draft EIR.

<sup>21</sup> City of Los Angeles General Plan, Safety Element, Exhibit B (shown in Figure IV.D-5 of this Draft EIR).

spreading.<sup>22</sup> The Project or Alternative 2's excavation for the subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC requirements. 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.<sup>23</sup> Application of appropriate engineering controls and compliance with regulations for planned excavation and construction activities under either the Project or Alternative 2 would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of the Project or Alternative 2 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 the exacerbation of existing environmental conditions. Impacts related to existing fault rupture, seismic shaking, liquefaction, or other geologic conditions would be less than significant under either the Project or Alternative 2. Under either the Project or Alternative 2, potentially significant impacts to archaeological and paleontological resources would be mitigated to levels that are less than significant. However, Alternative 2 would reduce the Project's automobile parking space in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, potentially reduce the extent of excavation required for the Project's parking levels. Therefore, impacts related to geologic conditions would be less than under the Project.

*(ii) Unstable Geologic Units*

The Project and Alternative 2 would require foundation excavations. Per Code requirements, prior to issuance of a grading permit for either the Project or Alternative 2, 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. Recommendations would include a shoring system of soldier piles with internal bracing and/or tied-back anchors and other suitable excavation engineering techniques. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts with respect to unstable geologic units would be less than significant under either the Project or Alternative 2. However, Alternative 2 would reduce the Project's automobile parking space in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, potentially reduce the extent of excavation required for the Project's parking levels. Therefore, impacts

<sup>22</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, page 9, March 2019. Contained in Appendix F of this Draft EIR.

<sup>23</sup> Group Delta, Op. Cit., page 9.

related to excavation and unstable geologic units would be less than under the Project.

### *(iii) Expansive Soils*

Under either the Project or Alternative 2, the corrosive and expansive potential of the soils would be addressed in the Final Geotechnical Report and taken into consideration prior to the installation of all underground pipes/clamps/structures. Compliance with standard construction and engineering practices (e.g., onsite excavation requiring suitable engineered stabilization in accordance with the 2016 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. Implementation of these regulations and practices would reduce hazards associated with potential expansive soils or corrosive soils. As such, impacts regarding expansive and corrosive soils would be less than significant and similar under both the Project and Alternative 2.

### *(iv) Paleontological Resources*

Excavation for both the Project and Alternative 2 would be to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending to approximately 40 feet below ground surface. As such, both the Project and Alternative 2 have the potential to encounter paleontological resources in previously undisturbed soils. In addition, the Project Site contains older Quaternary alluvial fan and fluvial deposits that potentially contain fossil specimens, which could also be impacted by excavation activities. Both the Project and Alternative 2 would require the implementation of mitigation measures MM-PALEO-1 through MM-PALEO-3. These mitigation measures would provide for appropriate treatment and/or preservation of resources if encountered. Under either the Project or Alternative 2, potentially significant impacts to paleontological resources would be mitigated to levels that are less than significant. However, Alternative 2 would reduce the Project's automobile parking spaces in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, potentially reduce the extent of excavation required for the Project's parking levels. Therefore, impacts related to excavation and the discovery of paleontological resources would be less than under the Project.

### *(f) Greenhouse Gas Emissions*

The construction and occupation of the Project Site under either the Project or Alternative 2 would increase GHG emissions over existing conditions. The Project's net operational emissions of 3,063 MTCO<sub>2</sub>e would be approximately 22 percent below the Project's net operational emissions that would be generated by the Project under the NAT scenario. Both the Project and Alternative 2 would implement PDF AQ-1 and PDF-GHG-1 to ensure that GHG emissions would be

consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the City's Green Building Ordinance. GHG impacts under either the Project or Alternative 2 would be considered to be less than significant. However, because Alternative 2 would reduce the Project's daily VMT and thus mobile emissions, impacts with respect to GHG emissions would be less than under the Project.

(g) *Hydrology and Water Quality*

(i) *Construction*

Construction activities under either the Project or Alternative 2 include excavation and grading, maintenance/operation of construction equipment, potential dewatering, and handling/ storage/disposal of materials. These activities could contribute to pollutant loading in stormwater runoff or groundwater, and potential changes in runoff. In addition, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events. On-site water activities for dust suppression could contribute to pollutant loading in runoff from the construction site. However, either the Project or Alternative 2's potential impacts would be reduced to less-than-significant levels through compliance with the required NPDES permit, including a construction SWPPP and respective BMPs. BMPs would ensure that neither the Project nor Alternative 2 would exceed surface and groundwater water quality standards during construction. BMPs would also control the direction and volume of runoff so that the capacities of existing storm drains would not be exceeded or existing drainage patterns would not be altered. As such, existing regulations, which include implementation of required BMPs, would reduce either the Project or Alternative 2's hydrology and water quality impacts related to construction to less than significant. However, Alternative 2 would reduce the Project's automobile parking space in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, potentially reduce the extent of excavation required for the Project's parking levels. Therefore, impacts related to exposure of soils and excavated materials would be less than under the Project.

(ii) *Operation*

The Project and Alternative 2 would have similar building setbacks and would similarly result in approximately 94 percent imperviousness of the Project Site. Both the Project and Alternative 2 would implement the City's LID measures, including biofiltration, rainwater harvesting, and infiltration, which would result in an effective change in Q10 runoff of -0.12 cfs, and effective change in Q50 runoff of 0 cfs. As such, both the Project and Alternative 2 would reduce existing runoff from the Project Site. Compliance with existing LID regulations, such as biofiltration, would ensure that neither the Project nor Alternative 2 would exceed surface and groundwater water quality standards during operation. The required LID would also ensure that the area's existing drainage patterns would not be

altered or that the rate and amount of surface runoff would not result in substantial on- or off-site siltation, erosion, or flooding. Therefore, impacts with respect to hydrology and water quality during operation would be less than significant and similar under both the Project and Alternative 2.

(h) *Land Use and Planning*

Both the Project and Alternative 2 would require a zone change to create a higher density and intensity of use, thus generating greater environmental effects than under existing conditions. Although most land use plans do not directly address environmental effects, land use and zoning designations are intended to physically organize a community and prevent encroachment of conflicting uses which, thus, would reduce certain environmental effects. Both the Project and Alternative 2 would implement the objectives of the General Plan Framework Element with respect to providing a diversity of uses in accordance with the Project Site's Regional Center Designation and concentration of mixed-use development along a corridor less than 0.25 miles from the Hollywood/Vine Metro Red Line, other public transit, and within walking distance of a broad range of uses to reduce VMT. Both the Project and Alternative 2 would further the policies of the Health and Wellness Element and the Housing Element's anti-displacement and sustainability standards by replacing 44 existing RSO residential units with 210 RSO units under the Project, and 271 RSO units under Alternative 2. Both the Project and Alternative 2 would implement the policies of the 2016 CALGreen Code, the Los Angeles Green Building Code, and LEED building design standards. Both the Project and Alternative 2 would provide bicycle parking spaces, increase residential density in proximity to transit, and improve sidewalks and pedestrian safety along Yucca Street, Vista Del Mar Avenue, and Argyle Avenue and would, thus, meet the policies of the Hollywood Redevelopment Plan, the City's Mobility Plan 2035, and SCAG RTP/SCS policies to support and encourage a land use pattern and circulation system that supports pedestrians, bicycles, and mass transit in existing urban environments, thus reducing vehicle miles. Overall, the density and location of either the Project or 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 and similar under both the Project and Alternative 2.

(i) *Noise and Vibration*

(i) *Construction*

Under either the Project or Alternative 2, construction activities would require the use of heavy-duty machinery, which would increase noise levels at several sensitive receptor locations in the area. Both the Project and Alternative 2 would implement MM NOISE-1, which would provide for sound barriers that would achieve a noise reduction of 15 dBA, MM-NOI-2, which would require equipment noise control, and MM-NOI-3, which would maintain a 15-foot setback between



large equipment and adjacent, off-site residences, as well as provide for an on-site construction liaison. Although these mitigation measures would result in a substantial reduction in noise and vibration, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at adjacent residential uses along Vista Del Mar Avenue (Location R3), the residential uses to the west across Argyle Avenue (Location R1), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (Location R4), and those on the north side of Yucca Street (Location R2) even after implementation.

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. However, under the Project or Alternative 2, because MM NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable. Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under both the Project and Alternative 4. The Project and Alternative 2 would have a similar building floor area and size and, as such, both the Project and Alternative 2 would result in significant and unavoidable construction noise and vibration impacts. However, Alternative 2 would reduce the Project's automobile parking space in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, reduce the extent of excavation required for the Project's parking levels. Therefore, the duration of impacts related to high noise and vibration levels during the excavation phase would be less than under the Project.

#### *(ii) Operation*

Operation under either the Project or Alternative 2 would increase mobile source noise (traffic) and onsite stationary and composite noise levels compared to existing conditions. Both the Project and Alternative 2 would implement MM-NOI-5, which would require a sound enclosure or equivalent noise-attenuating features at the emergency generator. Composite noise from on-site activities under either the Project or Alternative 2 would not exceed the City's threshold standards. Therefore, with the implementation of MM-NOI-5, stationary-source noise levels under either the Project or Alternative 2 would be less than significant. Regarding mobile-source noise, Project-related off-site traffic noise increases would not exceed the City's noise threshold standard. However, because daily VMT would

be i less under Alternative 2 (Alternative 2 would generate 6,585 total daily VMT versus the Project, which would generate 11,929 total daily VMT), mobile noise impacts would be less. As such, although both the Project and Alternative 2 would generate less than significant operation noise impacts, impacts would be less under Alternative 2 than under the Project.

(j) *Population and Housing*

Both the Project and Alternative 2 would incrementally increase population, housing, and employment, as well as result in the temporary displacement of tenants currently occupying the Project Site's existing 44 residential units. Alternative 2 would provide 271 new residential units, and generate approximately 552 new residents<sup>24</sup> (659 minus 107 existing residents) and 14 new employees, compared to the Project, which would provide 210 new residential units and generate approximately 403 new residents (510 minus 107 existing residents) and 99 new employees. With demolition of the existing 44 units, Alternative 2 would result in the net increase of 227 residential units. The Project would result in the net increase of 166 residential units. All units under either the Project or Alternative 2 would be consistent with the City's RSO. Both the Project and Alternative 2's new residents and employment opportunities would be less than significant because they would be consistent with SCAG's growth projections, would help the City meet its housing obligation under the SCAG RHNA allocation, and would provide the type of transit oriented development encouraged in the General Plan Housing Element and SCAG RTP/SCS policies. With the net increase of dwelling units under either Alternative 2 or the Project, the number of dwelling units that would be temporarily removed represents a small fraction of the housing growth expected Citywide and would not represent the displacement of a substantial number of existing housing such that the construction of replacement housing elsewhere would be required. As such, both the Project and Alternative 2 would have less than significant population and housing impacts. However, because Alternative 2 would provide more RSO housing than under the Project, it would meet the objectives of the General Plan Housing Element and SCAG RTP/SCS to a greater degree and, as such, impacts with respect to population and housing would be considered less than under the Project.

(k) *Public Services*

(i) *Fire Protection*

Both the Project and Alternative 2 would involve construction activities and intensify the use of the Project Site so that demand on fire protection and emergency medical services would be increased. As was indicated for the Project, the Project Site is well served by nearby fire stations with adequate ability to serve the site as well as sufficient hydrant water flow to meet the fire-fighting

<sup>24</sup> Based on the citywide household size of 2.43 persons per household.

requirements established by the LAFD. Further, the Project and Alternative 2 would have a site design that would be reviewed by LAFD and would be required to provide sufficient accessibility for fire-fighting activities. The Project and Alternative 2 would comply with regulatory measures for safety and would provide additional voluntary provisions for addressing emergency situations with on-site equipment and personnel. Both the Project and Alternative 2 would implement PDF-TRAF-1, to provide a Construction Management Plan to improve access around the construction site. PDF-FIRE-1, implemented under both the Project and Alternative 2, would facilitate occupants' voluntary fire and emergency medical procedures during operation that would reduce demand on the LAFD. Both the Project and Alternative 2 would comply with Fire Code regulations related to mixed residential and commercial uses and high-rise development. With the implementation of PDFs and applicable regulations, neither the Project nor Alternative 2 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, the neither the Project nor Alternative 2 would result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection would be less than significant under both the Project and Alternative 2. Because of the high activity and similarity in structures under both the Project and Alternative 2, impacts with respect to fire protection services would be similar.

#### *(ii) Police Protection*

The ratio of 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 a Project. Alternative 2 would result in a net increase in LAPD service population of 696,<sup>25</sup> compared to a net increase in the LAPD service population of 740 under the Project. Alternative 2 would generate an increase in population from 165,000 residents to 165,696 residents in the Hollywood Community Police Station service area, and would reduce the officer to resident ratio from one officer per 468 residents to one officer per 470 residents, based on 352 sworn officers. With a generation factor of 16 crimes per 1,000 residents, Alternative could potentially result in approximately 11 additional crimes per year (notwithstanding proposed PDFs), compared to 12 crimes per year under the Project. Both the Project and Alternative 2 would implement PDF-POL-1 to increase security and reduce vandalism during construction. The Project and Alternative 2 would both implement PDF-POL-2 through PDF-POL-5, to provide 24-hour security personnel and cameras, design landscaping to not impede visibility, require participation in community crime prevention efforts, and provide building diagrams to the LAPD. Implementation of these measures would reduce Alternative 2 and the Project's demand on police services. With implementation of

<sup>25</sup> Based on City CEQA Thresholds Guide, K. Police Service Population Conversion Factors of 3 persons per residential unit (227-unit net increase), 3 persons/1,000 sf of commercial/restaurant (5,120 sf).

PDFs, neither the Project nor Alternative 2 would increase fire 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, neither the Project nor Alternative 2 would result in potential physical impacts associated with construction of police facilities. Therefore, impacts with respect to police protection would be less than significant under both the Project and Alternative 2. However, because Alternative 2 would generate a lower service population than under the Project, impacts with respect to police protection services would be less under Alternative 2.

### *(iii) Schools*

Both the Project and Alternative 2 would generate a net increase in school age children. Alternative 2's 271 residential units are anticipated to generate a net increase of approximately 81 school age children<sup>26</sup> and the Project's 210 residential units would generate a net increase of approximately 52 new school age children. The additional students from the Project or Alternative 2 would attend local schools and have the potential to exceed the number of available seats at local schools. However, pursuant to Section 65995 of the California Government Code, the 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 would be less than significant under either the Project or Alternative 2. However, because the Project would generate fewer new students, impacts with respect to school services would be less than under Alternative 2.

### *(iv) Parks and Recreation*

Both the Project and Alternative 2 would generate new residents, who would increase demand for parks and recreational facilities. Both the Project and Alternative 2 would incorporate open space in excess of Code standards, including the podium courtyard, which would be equipped with lounge seats, a gaming lounge, gas fire pit and lounge, BBQ, and dining tables and chairs; indoor recreational amenities; and roof top garden and pool deck. The Project and Alternative 2 would also incorporate a rooftop garden in Building 2. Due to the amount, variety, and availability of the open space and recreational amenities under both the Project and Alternative 2, it is anticipated that residents would generally utilize on-site open space to meet their recreational needs. Both the

<sup>26</sup> Student generation rates for multi-family units are 0.1999 elementary students per unit, 0.0546 middle school students per unit, and 0.0943 high school students per unit for high school students. Respectively, Alternative 2 (271 units) would generate 54 elementary school students, 15 middle school students, and 25 high school students for an estimated total of 94 students. Subtracting the Project Site's estimated existing students (13), the net total would be 81 students.

Project and Alternative 2 would comply with LAMC Section 21.10.3 regarding a dwelling unit construction tax of \$200 for each new residential unit for City acquisition of new park space. Furthermore, both the Project and Alternative 2 would meet the applicable requirements set forth in LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space and parkland requirements. Although neither the Project nor Alternative 2 would meet the parkland provision goals set forth in the Public Recreation Plan, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, neither the Project nor Alternative 2 would 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. Impacts with respect to parks and recreation would be less than significant. However, because the Project would generate less new population, impacts with respect to parks and recreation services would be less than under Alternative 2.

*(v) Libraries*

Both the Project and Alternative 2 would increase demand for library services. However, all of the residential units under either the Project or Alternative 2 would be equipped to use individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. In addition, both the Project and Alternative 2 would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. Based on the above, target service populations, and library sizing standards, operation of either the Project or Alternative 2 would not create any new exceedance of the capacity of local libraries to adequately serve the proposed residential population. Therefore, neither the Project nor Alternative 2 would 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. However, because the Project would generate less new population, impacts with respect to library services would be less than under Alternative 2.

*(l) Transportation*

The following discussion of Project impacts is based on the *Alternatives Analysis Memorandum* prepared by Gibson Transportation Consulting, Inc., which is provided in Appendix L-3 of this EIR. The discussion evaluates the relative differences and similarities between Alternative 2 and the Project.

*(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

The Project and Alternative 2 would support multimodal transportation options and a reduction in VMT per resident/employee, as well as promote transportation-related safety in the Project area. The Project and Alternative 2 would not conflict with policies of Mobility Plan 2035 adopted to protect the environment and reduce VMT. The Project and Alternative 2 would also be consistent with applicable transportation goals of the Hollywood Community Plan Objective 6 to coordinate land use densities and to promote the use of transit. Mitigation Measure TRAF-1 under the Project and Alternative 2 would implement a TDM Program to address trip reduction and use of alternate modes of transportation. The Project and Alternative 2 would not conflict with VisionZero to reduce traffic-related deaths or with LADOT MPP, Section 321, regarding driveway design standards. The Project and Alternative 2 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. As with the Project, Alternative 2 would include bicycle parking spaces for residents, employees, and visitors. The Project and Alternative 2 would also provide for pedestrian improvements, including streetscape and lighting improvements along the street frontages, which would enhance pedestrian safety. The Project and 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 under the Project and Alternative 2.

*(i) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

**Table V-3, VMT Analysis Summary – Alternative 2**, below, illustrates the daily VMT before and after implementation of TDM strategies (Mitigation Measure MM-TRAF-1). As shown in Table V-3, Alternative 2 would generate approximately 7,514 VMT per day, which is less than the 12,607 VMT under the Project. Alternative 2 would generate an average household VMT per capita of 7.5 prior to mitigation, which would exceed the Central APC impact threshold of 6.0 and, therefore, would result in a potentially significant VMT impact.

**TABLE V-3**  
**VMT ANALYSIS SUMMARY – ALTERNATIVE 2**

Alternative Land Uses	Size
Multi-Family Housing	271 units
Restaurant	5,120 square feet
Analysis <sup>a</sup>	
Resident Population	611
Employee Population	20
Project Area Planning Commission	Central
Project Travel Behavior Zone	Compact Infill (Zone 3)
	<div>Alternative 2 before MitigationAlternative 2 with Mitigation</div>
Daily VMT <sup>b</sup>	7,5146,663 <sup>c</sup>
Home-Based Production VMT <sup>d</sup>	4,5913,612
Home-Based Work Attraction VMT <sup>e</sup>	8181
Household VMT per capita <sup>f</sup>	7.55.9 [d]
Impact Threshold	6.06.0
Significant Impact	YESNO
Work VMT per Employee <sup>g</sup>	4.14.1
Impact Threshold	7.67.6
Significant Impact	NONO

**NOTES:**

- a Alternative Analysis is from VMT Calculator output reports provided in the Alternatives Analysis Memorandum, which is in Appendix L-3 of this EIR.
- b Total daily VMT is the Alternative-generated total VMT generated by all trips, regardless of trip purpose, to and from the Project Site.
- c Alternative 2 would require an increase in the cost of unbundled parking compared with the Project in order to reduce the impact to a less-than-significant level.
- d Home-Based Production VMT are one-way trips to a workplace destination originating from a residential use at the Project Site.
- e Home-Based Work Attraction VMT are one-way trips to a workplace destination at the Project Site originating from a residential use.
- f Household VMT per capita is the total Home-Based VMT productions divided by the residential population of the project.
- g Total population or trip count below VMT Calculator screening criteria. Result was manually calculated using component VMT and population data above.

SOURCE: City of Los Angeles VMT Calculator and VMT Calculator User Guide; Gibson Transportation Consulting, 2020.

As with the Project, Alternative 2 would implement a TDM Program required under MM-TRAF-1. However, MM-TRAF-1 under Alternative 2 would be modified based on its contemplated uses to increase the cost to residents of an unbundled parking space compared with the Project in order to achieve the necessary reduction in VMT to be below the significance threshold of household VMT per capita of 6.0.<sup>27</sup> Following implementation of mitigation, Alternative 2 would generate average household VMT per capita of 5.9, which is under the impact threshold and, therefore, would reduce the VMT impact below the level of significance. With mitigation, VMT impacts under either the Project or Alternative 2, when considering both household VMT per capita and work VMT per employee, would be less than significant. The household VMT per capita and the work VMT per employee under Alternative 2 would be less than the Project's. Therefore, VMT impacts would be less under Alternative 2 than under the Project.

*(i) Design Hazards*

The Project and Alternative 2 would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. Total existing curb cuts would be reduced from five to a total of three. 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. The Project and Alternative 2 would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. They would also contribute to overall walkability through enhancements to the Project Site and streetscape and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant and similar under the Project and Alternative 2.

*(i) 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. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project or 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, the Project and Alternative 2 would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding

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<sup>27</sup> The cost to residents of an unbundled parking space would be increased from \$150 per month under the Project's TDM Program to \$175 per month under Alternative 2's TDM Program.



emergency access would be less than significant and similar under the Project and Alternative 2.

(m) *Tribal Cultural Resources*

The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment indicated no known Tribal cultural resources within the Project Site or surrounding area. However, excavations associated with the Project could have a potential, albeit a low potential, to encounter previously unknown and buried Tribal cultural resources. In the unlikely event that buried Tribal cultural resources are encountered during construction, 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. The Project and Alternative 2 require the same scale of site preparation and surface grading and, as such, would have similar opportunity to uncover any potential Tribal cultural resources. Compliance with the City's standard Conditions of Approval would ensure that both the Project and Alternative 2 would result in similar and less than significant impacts with respect to Tribal cultural resources.

(n) *Utilities and Service Systems – Water, Wastewater, Solid Waste*

(i) *Water Supply*

Alternative 2 would generate demand for the water resources, as shown in **Table V-4, Alternative 2 Estimated Domestic Water Demand**. As indicated, Alternative 2 would require approximately 25,024.8 gpd or approximately 26.67 AFY. In contrast, the Project would increase on-site water demand by approximately 62,995 gpd or approximately 67.13 AFY.<sup>28</sup> The difference between the Project and Alternative 2 is the result of the elimination of the hotel use, a high water consumer, and reduction in spa and restaurant floor area under Alternative 2. The water supply analysis for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. Because Alternative 2 would substantially reduce the Project's water demand, it is assumed that LADWP would also have sufficient supply for the Alternative. As with the Project, Alternative 2 would include numerous design features to reduce the demand for water consumption. Water infrastructure and water supply would be sufficient to meet the demands of both the Project and Alternative 2 without mitigation and, as such, both the Project and Alternative 2 would have a less than significant impact with respect to water services. However, because Alternative 2 would generate a lower water demand than the Project, impacts would be less than under the Project.

<sup>28</sup> See Table IV.N.1-8, *Estimated Domestic Water Demand for Project*, in Section IV.N.1 of this Draft EIR.

**TABLE V-4**  
**ALTERNATIVE 2 ESTIMATED DOMESTIC WATER DEMAND**

Land Use	Quantity	Factor (gpd) <sup>a</sup>	Wastewater Generation (gpd)	Annual Water Demand (AFY) <sup>b</sup>
<b>Existing Uses</b>				
Residential Single-Family	1 unit	185 /d.u.	185	0.25
Residential Multi-Family	2 units	150 /d.u.	300	0.40
Residential: Apartment – Bachelor	1 unit	75 /d.u.	75	0.10
Residential: Apartment 1-Bedroom	26 units	110 /d.u.	2,860	3.85
Residential: Apartment 2-Bedroom	14 units	150 /d.u.	2,100	2.82
Parking/Asphalt/Hardscape Areas <sup>c</sup>	28,000 sf	20 /1,000 sf	560	0.75
<b>Total</b>			<b>6,080</b>	<b>8.17</b>
<b>Proposed Uses</b>				
Residential: Apartment – 1 Bedroom	132 units	110 /d.u.	14,520	16.26
Residential: Apartment – 2 Bedroom	96 units	150 /d.u.	14,400	16.13
Residential: Apartment – Suite (2 bedroom)	26 units	190 /d.u.	4,940	5.53
Restaurant/Retail/Commercial	5,120 sf	0.05/sf	256	0.29
Parking Structure	190,605 sf	20 /1,000 sf	3,812	4.27
<b>Subtotal</b>			<b>37,928</b>	<b>42.48</b>
<i>Less Additional Conservation (20%)<sup>d</sup></i>			-6,823.2	-7.64
<b>Total</b>			<b>31,104.8</b>	<b>34.84</b>
<b>Net Increase (Proposed minus Existing)</b>			<b>25,024.8</b>	<b>26.67</b>

Note: DU. = dwelling unit; SF = square feet; gpm = gallons per minute; gpd = gallons per day; AFY = acre feet per year.

a Wastewater generation factors obtained from *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.

b An acre-foot equals approximately 325,851 gallons

c 18,000 square feet of parking/asphalt area and 10,000 square feet of hardscape area.

d Estimated 20 percent water use reduction due to additional water conservation commitments agreed by the Project applicant: installation of waterless urinals; 1.75 gpm for shower heads; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible. The parking structure is excluded from this reduction as water conservation measures do not apply.

SOURCE: *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and ESA, 2017

(ii) *Wastewater*

Both the Project and Alternative 2 would increase wastewater generation over existing conditions; thus, increasing demand on the existing Hyperion Treatment Conveyance System or Hyperion Treatment Plant. The Project is estimated to increase on-site wastewater generation by approximately 62,995 net gpd (69,075 gpd under the Project minus 6,080 gpd generated by existing uses).<sup>29</sup> The Project's additional wastewater generation would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Wastewater generation under Alternative 2 would be within the limits of its water demand of 25,024.8 gpd, or less than half of the wastewater generated by the Project (see Table V-4). Because the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant have adequate capacity to serve the Project, it would also have sufficient capacity to serve Alternative 2. Impacts with respect to wastewater treatment and conveyance under both the Project and Alternative 2 would be less than significant. However, because Alternative 2 would generate substantially less wastewater than under the Project, impacts with respect to wastewater conveyance and treatment systems would be less.

(iii) *Solid Waste*

The Project and Alternative 2 would both increase demand for solid waste disposal. The Project and Alternative 2 would require the same demolition and similar scale of construction activity. Both the Project and Alternative 2 would generate approximately 3,307 tons of C&D waste associated with demolition and 1,001 tons of C&D waste associated with building construction, for a total of 4,308 tons of C&D waste. This 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 2 would be similar and less than significant.

As shown in **Table V-5, *Alternative 2 Estimated Operational Solid Waste Generation***, Alternative 2 would generate 2,801.93 pounds per day and 511.33 tons per year. Based on Citywide diversion rates of at least 76.4 percent, Alternative 2's solid waste generation would be reduced to 661.26 pounds per day and 120.67 tons per year.<sup>30</sup> With diversion, the Project's annual solid waste generation would be 0.001 percent of the County's annual waste generation and would account for less than 0.0001 percent of the remaining capacity.<sup>31</sup> With diversion, Alternative 2's annual solid waste generation would be approximately

<sup>29</sup> See Table IV.N.1-7, *Wastewater Generated During Operation*, in Section IV.N.1 of this Draft EIR.

<sup>30</sup> See Table IV.N.1-11, *Estimated Operational Solid Waste Generation*, in Section IV.N.1 of this Draft EIR.

<sup>31</sup> The estimated Los Angeles County annual disposal rate is estimated to be 9.457 million tons per year and the remaining capacity is estimated to be 114 million tons.

less than 0.001 percent of the County's annual waste generation and less than 0.0001 percent of the remaining capacity. Because of the small increase in waste disposal represented by the Project and Alternative 2, neither would 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. As such, impacts with respect to solid waste generation would be less than significant. However, because the Project would generate incrementally less solid waste than under Alternative 2, impacts with respect to waste disposal would be less.

**TABLE V-5  
ALTERNATIVE 2 ESTIMATED SOLID WASTE GENERATION - OPERATION**

<b>Land Use</b>	<b>Quantity (units/sf)</b>	<b>Factor<sup>a</sup></b>	<b>Solid Waste Generation (lbs/day)</b>	<b>Solid Waste Generation (tons/year)</b>
<b>Existing Land Uses</b>				
<b>Residential</b>				
(43 multi-family + 1 single-family)	44 units	12.23 lbs./unit <sup>b</sup>	538	98.19
<b>Total</b>			538	98.19
<b>Proposed Land Uses</b>				
Residential	271 units	12.23 lbs./unit	3,314.33	604.85
<b>Restaurant/Retail</b>	5,120 sf	5 lbs./1,000 sf./day	25.6	4.67
<b>Total</b>			3,339.93	609.52
Net Increase (Proposed minus Existing)			2,801.93	511.33
<b>Net Increase (Post-diversion)<sup>c</sup></b>			<b>661.26</b>	<b>120.67</b>

NOTE: sf = square feet; lbs. = pounds.

<sup>a</sup> Generation factors provided by CalRecycle at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed January 2019.

<sup>b</sup> Generation factor provided applies to both single-family residential and multi-family residential.

<sup>c</sup> Based on an anticipated diversion rate of 76.4 percent for operations.

SOURCE: ESA, 2020.

### (o) *Utilities and Service Systems – Energy Infrastructure*

Alternative 2, as with the Project, would utilize energy infrastructure to accommodate its 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. 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

Alternative 2, the Primarily Residential Mixed-Use Alternative, would increase the City's RSO housing stock and revitalize the character of the street. As such, Alternative 2 would be fully consistent with the following Project objectives:

**Objective 4:** To provide a diverse mix of dwelling units that appeal to a range of household sizes to help meet the critical demand for new housing in the Hollywood Community Plan area.

**Objective 5:** To increase the City's stock of rent controlled units under the City's RSO through a project that provides 100 percent of its residential apartment units as RSO units.

**Objective 6:** To provide a right of return for residents of existing onsite residential apartment units subject to the Rent Stabilization Ordinance.

**Objective 8:** To revitalize the streetscape surrounding the Project Site and encourage pedestrian activity and bicycle use by creating a streetscape design that allows for outdoor café tables, parkway planters and bicycle parking within an overall landscape design that integrates the Project development into the surrounding urban neighborhood.

Alternative 2 would eliminate the Project's hotel use and reduce the Project's retail and restaurant floor area. As a result, Alternative 2 would only be partially consistent with policies related to the provision of a hotel use and job creation, including the following:

**Objective 1:** To construct an infill development that balances commercial and residential uses by providing a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the Project Site area.

**Objective 2:** To redevelop the underutilized Project Site, which is located in an area designated by the City as a Transit Priority Area, with an economically viable and attractive transit-oriented high-density, mixed-use development that

combines residential uses with visitor-serving hotel and restaurant uses near existing transit.

**Objective 3:** To promote and support local and regional mobility, greenhouse gas and air quality objectives to reduce vehicle miles traveled, reduce reliance on single-passenger vehicles and increase the use of public transit, and maximize infill development by constructing a high-density residential, hotel and commercial/restaurant mixed-use development on a site within a designated Transit Priority Area that is located within one-quarter mile of key public transit facilities, including the Hollywood and Vine Red Line Station.

**Objective 7:** To support job creation and to increase business opportunities within Los Angeles by developing the Project's hotel and commercial/restaurant uses on a site well-served by transit.

### **c) Alternative 3: No Commercial Zone Change, No High Density Residential, No Density Bonus**

#### **(1) Description of the Alternative**

The No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative (Alternative 3) would provide 101 RSO residential units and eliminate the Project's hotel, retail, and restaurant uses. Development under Alternative 3 would be consistent with three zoning designations over the Project Site, including C4-2D-SN and R4-2D in the west sector fronting Yucca Street and Argyle Avenue, and (Q)R3-1XL in the east sector fronting Yucca Street and Vista Del Mar Avenue. All of these zones allow multi-family residential development. The existing C4 and R4 zones permit multi-family uses up to the R4 density, which requires a minimum density of 400 square feet of lot area per unit. The R4-zoned sector has a total of 39,421.9 square feet of lot area; thus, allowing the construction of up to 98 residential units. The existing R3 zone in the east sector allows multi-family uses and requires a minimum of 800 square feet of lot area per unit. The R3-zoned sector of the Project Site contains 10,941.9 square feet, which allows up to 13 residential units. Alternative 3 would provide a total of 101 residential units, which would be consistent with the zoning designation and the number of residential units that could be developed on the Project Site without the need for additional approvals. With the subtraction of the Project Site's existing 44 RSO residential units, Alternative 3 would result in a net increase of 57 RSO residential units.

Building construction in the C4- and R4-zoned sectors would be four stories of Type III construction and a single-story parking podium of Type 1 construction, for a total of five stories. The podium would provide parking for Alternative 3. In the R3 zones, the building would be tiered to meet the 1XL, 30-foot height constraint along Vista Del Mar Avenue.

Alternative 3 would provide 36 studio units, 41 one-bedroom units, and 24 two-bedroom units. Based on the current zoning designations for the site, up to 107 residential units could be developed without the need for additional approvals. No affordable housing is proposed under this Alternative. However, all units would be rental units and subject to the City's RSO requirements.

Alternative 3 would require approximately 123 automobile parking spaces, compared to a total of 436 provided by the Project.<sup>32</sup> Alternative 3 would also require 83 bicycle parking spaces. LAMC required parking is outlined in **Table V-6, Alternative 3 Code-Required Automobile and Bicycle Parking**, below. Parking would be located in a one subterranean structure accessed via Yucca Street.

**TABLE V-6  
ALTERNATIVE 3 CODE-REQUIRED AUTOMOBILE AND BICYCLE PARKING**

Unit Type	Factor	Number of Units			Required Parking
Automobile Parking:[a]					
Studio	1 space per unit	36			36 spaces
One-bedroom	1 space per unit	41			61 spaces
Two-bedroom	2 spaces per unit	24			48 spaces
Subtotal		101			145 spaces
Reduction for Inclusion of Bicycle Parking	10% Reduction (22 space reduction)				123 spaces
Bicycle Parking:[b]					
	Long-Term Factor	Long Term Spaces	Short-Term Factor	Short-Term Spaces	Total spaces
Up to 25 units	1 space per unit	25	1 space per 10 units	2.5	28 spaces
26-100 units	1.5 spaces per unit	55	1 space per 15 units	4.9	60 spaces
101+ units	1 space per 2 units	1	1 space per 20 units	0.05	1 space
Total Bicycle Parking:		81		8	89 spaces

[a] Per LAMC Sec. 12.21.A.4

[b] Per LAMC Sec. 12.21.A.16(a)(I)(i)

SOURCE: ESA, 2020

<sup>32</sup> The parking spaces provided for the Project and Alternative 3 reflect reductions allowed under the LAMC for inclusion of bicycle parking.

Under Alternative 3, a gym and community lounge would be provided on Level 2 (above the podium) along with a pool and amenity deck facing south. Balconies would be provided for most units on all facades. No amenities would be provided on the roof deck. Open space and amenity features would meet the minimum 12,200 square feet required per LAMC requirements. Access to parking garage would be provided from Argyle Avenue and Yucca Street.

Building setbacks would be consistent with LAMC Section 12.11.C requirements for multi-family residential uses, including fifteen-foot front yard setbacks (or ten-foot minimum front yard setbacks on key [corner] lots), fifteen-foot back yard setbacks, and side yards of a minimum of five feet plus one foot for each story above the second story.

Because Alternative 3 proposes development consistent with the site's designated zoning, the Project's requested approvals for a Zone Change and Height District Change would not be required. The FAR for Alternative 3 (averaged over the Project Site) would be approximately 1.98:1, compared to the Project's FAR of 6.6:1.

## (2) Environmental Impacts

### (a) *Aesthetics/Visual Resources*

Senate Bill (SB) 743 and Zoning Information File No. 2452 (ZI No. 2452) provide that a mixed-use project in a designated urban TPA site is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Although the Project meets this criterion, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, and light/glare.

#### (i) *Views*

Alternative 3 would reduce the Project's maximum building height from 20 stories to a maximum of 5 stories. Building setbacks would be similar to those proposed under the Project and consistent with existing zoning requirements. Neither the Project nor Alternative 3 would substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views. Neither would block panoramic views that occur in the background of open street corridors (such as views of the Hollywood Sign through north-facing Gower Street). No existing views across the Project Site of the Capitol Records Building or other scenic resources are available and, as such, Alternative 3 would not impact views of these resources. Because the reduced building height, Alternative 3 would be less visible than the Project from the Jerome D. Daniel Overlook above the Hollywood Bowl and other areas along Mulholland Drive, and would have less effect on vistas of the Los Angeles Basin. View impacts would be less than significant under both the Project and Alternative 3; however, Alternative 3 would result in less impact with respect to views because of its lower



height. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.

*(ii) Scenic Resources*

The Project Site is not located along, or within the view field of, a state scenic highway and, with the exception of two small street trees along the Project's Argyle Avenue right-of-way (ROW) and three palm trees along the Project's Vista Del Mar ROW does not contain scenic resources such as trees or rock outcroppings. The Project Site is located within and adjacent to the Vista Del Mar/Carlos Historic District. The two on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Historic District, are considered to longer contribute to the scenic historical character of the District. As such, removal of these buildings would not directly impact a scenic resource. Two on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Historic District, are considered to longer contribute to the scenic historical character of the District. As such, removal of these buildings would not directly impact a scenic resource. The height of the Project within the Vista Del Mar parcels would be consistent with the existing 1XL zoning (30 feet maximum building height) and the scale of the adjacent residential neighborhood and, as such, would not indirectly impact the Historic District. The building setback from Vista Del Mar Avenue would be consistent with the requirements of the R3 zone. Overall, the Project Site has limited visual quality and does not contain significant aesthetic or visual resources. Therefore, development under either the Project or Alternative 3 would not substantially damage scenic resources, including historical buildings, that contribute to the area's scenic value and, as such, impacts with respect to scenic resources would be less than significant. However, because Alternative 3 would reduce the height of both Buildings 1 and 2, it would have less contrast with the scale of the Historic District and would reduce the Project's less than significant indirect impact. With the exception of aesthetic impacts on historic scenic resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not considered significant pursuant to SB 743 and ZI No. 2452.

*(iii) Consistency Regulations that Govern with 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. The Project and Alternative 3 would comply with the City's street tree requirements and comply with exterior lighting in compliance with LAMC regulations, and would comply with signage regulations set forth under the Hollywood Signage SUD. In addition, the Project and 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 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. The Project and 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, because neither the Project nor Alternative 3 would conflict with the LAMC, Hollywood Signage SUD, or the applicable Community Plan open space policy, impacts would be less than significant and similar under the Project and Alternative 3.

#### *(iv) Visual Character and Quality*

The potential for a project to degrade the existing visual character or quality of public views the site and its surroundings is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

Under existing conditions, the on-site multi-family apartment buildings are well-kept, but do not possess significant architectural, historical or otherwise significant aesthetic character. At present, the Yucca Street frontage is visually dominated by older utility poles and overhead power lines. Adjacent sidewalks are in disrepair and the street lacks amenities such as street trees and security/ pedestrian lighting that would support pedestrian traffic along Yucca Street between Vista Del Mar Avenue and Argyle Avenue. Both the Project and Alternative 3 would replace the chain link-fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue with a landscaped residential use and implement PDF-AES-1 and PDF-AES-2. PDF-AES-1 would require overhead utility lines to be located underground and PDF-AES-2 would require construction fencing to reduce visual impacts of the Project's construction site. Both the Project and Alternative 3 would improve the street front with improved sidewalks, landscaping, street trees, and security lighting. However, no restaurants or other commercial uses, which would enhance the public interface, would be provided. Neither the Project nor Alternative 3 would substantially degrade the existing visual character or quality of the site and its surroundings. Impacts under both the Project and Alternative 3 would be less than significant. However, because of the reduction in building height, Alternative 3 would have less contrast with respect to the adjacent single-family neighborhood and, as such, impacts with respect to visual character would be less than under the Project.

#### *(v) Light and Glare*

Exterior light sources under Alternative 3 would include security and landscaping lighting. Lighting would primarily consist of a mix of standard incandescent light fixtures, as well as various types of efficient/low energy fixtures. Both the Project and Alternative 3 would implement PDF-AES-3, which requires that outdoor

lighting along streets to be placed to minimize visibility from adjacent residential uses, would be implemented. Lighting would be designed and strategically placed to minimize glare and light spill onto adjacent properties. Because of Alternative 3's reduced building height, the potential for glare from reflected sunlight would be less than under the Project. With implementation of applicable PDFs, the Project and Alternative 3 would result in less than significant impacts related to light and glare. However, because commercial uses would be eliminated and the scale of Alternative 3 relative to the Project would be substantially reduced, light and glare impacts would be less under Alternative 3. Pursuant to SB 743 and ZI No. 2452, light and glare impacts would not be considered significant.

*(b) Air Quality*

*(i) Consistency with Air Quality Management Plan*

The Project and Alternative 3 would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during construction, including compliance with SCAQMD Rule 403, CARB off-road diesel standards, L.A. Green Building Code, Air Pollutions Control Officers Association (CAPCOA) recommendations, and Green Building Measures under PDF-AQ-1. Both the Project and Alternative 3 would be consistent with the applicable growth projections and control strategies used in the development of the AQMP, and would not jeopardize attainment of the air quality levels identified in the Plan. During operation, both the Project and Alternative 3 would incorporate control strategies set forth in the AQMP such as location efficiency, increased density, transit accessibility, improved development design, and other measures. Both the Project and Alternative 3 would be consistent with the City's growth projections and policies of the General Plan Air Quality Element for achieving emission reduction goals. As such, impacts with respect to consistency with AQMP and General Plan air quality policies would be less than significant and similar under both the Project and Alternative 3.

*(ii) Violation of Air Quality Standard/Emissions*

*(a) Construction*

Both the Project and Alternative 3's construction phases have the potential to generate emissions, including TACs, through the use of heavy-duty construction equipment, generation of construction traffic, fugitive dust emissions, paving operations, and the application of architectural coatings and other building materials. Both the Project and Alternative 3 would implement Mitigation Measure MM-AQ-1 to require off-road diesel-powered equipment to meet the CARB and USEPA Tier 4 Final standards and to use pole power to the extent feasible, which would reduce potentially significant regional construction impacts to a less than significant level. As with the Project, Alternative 3's maximum daily localized construction emissions would not exceed the localized thresholds for CO, NOX,

PM10, and PM2.5. Therefore, similar to the Project, localized construction emission impacts under alternative 3 on sensitive receptors would be less than significant. Also, the qualitative assessment as well as the health risk modeling concluded that TAC emissions from the Project's construction activities would not expose sensitive receptors to substantial TAC concentrations. Although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations. Similar to the Project, Alternative 3 would not expose sensitive receptors to substantial TAC concentrations. However, Alternative 3 would require less earthwork for parking facilities (one subterranean level versus two levels for the Project) and would represent less than a third of the Project's total building size. Alternative 3's smaller scale would reduce the duration of construction and, as such, construction emissions under Alternative 3 would be less than the Project.

(b) Operation

The Project and Alternative 3, both of which would generate stationary and mobile emissions during operation, would implement PDF-AQ-1. PDF-AQ-1 requires energy efficiency features, such as reductions in building energy and resource consumption with energy efficient appliances and reduced building energy usage sufficient to meet the applicable Title 24 standard. Reductions include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content. With implementation of PDF-AQ-1, maximum daily net operational emissions, under either the Project or Alternative 3 would not exceed the SCAQMD numeric thresholds for air pollutants. Because neither the Project nor Alternative 3 would exceed SCAQMD numeric thresholds for air pollutants with regard to regional, localized or TAC emissions, as well as CO Hotspots, operational air quality impacts would be less than significant. However, because Alternative 3 would be less than 1/3<sup>rd</sup> of the Project's size, would have substantially fewer occupants, and would result in fewer than 250 net new daily trips, Alternative 3 would generate fewer operation and mobile emissions compared to the Project. As such, emissions generated during operation would be less under Alternative 3 than under the Project.

(c) Cultural Resources

(i) Historical Resources

Both the Project and Alternative 3 would demolish two on-site buildings located within the Vista Del Mar/Carlos Historic District. These buildings, however, are not considered contributors to the Historic District and demolition of such is not considered to destroy or alter any primary character-defining features of the Historic District. The scale of the Project has the potential to contrast with the Historic District's one- and two-story single-family homes, and could indirectly impact the Historic District. In this regard, the Project's and three-story Building 2

would provide a transitional buffer between the 20-story, contemporary tower (Building 1) and the adjacent Historic District. Although the Project and would conform with Secretary of the Interior's Standards and, as such, would result in a less than significant historical resources impact, Alternative 3 would reduce the Project's 20-story tower component and would be more consistent with the scale of the Historic District. This would be wholly consistent with the scale of the Historic District. As such, although both the Project and Alternative 3 would result in less than significant historical resources impacts, indirect impacts on the Historic District would be less under Alternative 3.

(ii) *Archaeological Resources*

Under Alternative 3, as with the Project, grading and excavation into native soils would be necessary to provide subterranean parking or building foundations. However, because Alternative 3 would require fewer automobile and bicycle parking spaces, compared to the Project, it is anticipated that Alternative 3 would require only partially subterranean parking levels compared to two subterranean levels under the Project. Both the Project and Alternative 3 would require excavation for building foundations, and both the Project and Alternative 3 have the potential to encounter archaeological resources in previously undisturbed soils. Both the Project and Alternative 3 would require the implementation of mitigation measures MM-ARCH-1 through MM-ARCH-3. These mitigation measures would provide for appropriate treatment and/or preservation of resources if encountered. Under either the Project or Alternative 3, potentially significant impacts to archaeological resources would be mitigated to levels that are less than significant. However, because excavation would be less extensive under Alternative 3, impacts would be less than under the Project.

(d) *Energy*

Both the Project and Alternative 3 would incorporate a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand, they would not result in the wasteful, inefficient, or unnecessary consumption of electricity. In addition, neither the Project nor Alternative 3 would result in an increase in demand for electricity, natural gas, or transportation energy, or require that would exceed available supply. Both the Project and Alternative 3 would implement state and local conservation policies and regulations. Thus, 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 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 3 would be similar to the Project

(e) *Geology, Soils, and Paleontological Resources*(i) *Exacerbation of Existing Environmental Conditions*

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault and, as such, requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface displacement from the fault.<sup>33</sup> However, Geotechnical faulting investigations have indicated that no active faulting, including the Hollywood Fault, occurs beneath or projects toward the Project Site.<sup>34</sup> Although the Project Site is subject to potential earthquake ground shaking, implementation of applicable LAMC Chapter IX (Building Code) seismic design provisions would require the latest seismic design standards for structural loads and materials, and accommodate maximum ground accelerations from known faults. Respectively, a design-level geotechnical report, applicable to either the Project or Alternative 3, will be required to develop geotechnical recommendations for final design, including drilling and sampling geotechnical borings and detailed engineering analyses. With implementation of applicable regulations and recommendations of the geotechnical report, impacts with respect to ground shaking under either the Project or Alternative 3 would be less than significant. Although the Project Site is located within an area susceptible to liquefaction,<sup>35</sup> site-specific liquefaction analysis indicates that the Project Site is primarily underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral spreading.<sup>36</sup> The Project or Alternative 3's excavation for the subterranean parking or building foundations would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC requirements. 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.<sup>37</sup> Application of appropriate engineering controls and compliance with regulations for planned excavation and construction activities under either the Project or Alternative 3 would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of the Project or Alternative 3 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 the exacerbation of existing environmental conditions. Impacts related to existing fault

<sup>33</sup> Earthquake Fault Zones, Special Publication 42, Interim Revised 2018, prepared by Department of Conservation, California Geological Survey, <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>, accessed October 2018.

<sup>34</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, pages 7-8, March 2019. Contained in Appendix F of this Draft EIR.

<sup>35</sup> City of Los Angeles General Plan, Safety Element, Exhibit B (shown in Figure IV.D-5 of this Draft EIR).

<sup>36</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, page 9, March 2019. Contained in Appendix F of this Draft EIR.

<sup>37</sup> Group Delta, Op. Cit., page 9.

rupture, seismic shaking, liquefaction, or other geologic conditions would be less than significant under either the Project or Alternative 3. However, because Alternative 3 would be substantially smaller and require less earthwork than Project, impacts with respect to environmental conditions are considered less than under the Project.

*(ii) Unstable Geologic Units*

The Project and Alternative 3 would require foundation excavations. Per Code requirements, prior to issuance of a grading permit for either the Project or Alternative 3, 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. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts with respect to unstable geologic units would be less than significant under either the Project or Alternative 3. However, because Alternative 3 would involve less excavation and shallower foundation structures, impacts with respect to unstable geologic units would be less than under the Project.

*(iii) Expansive Soils*

Under either the Project or Alternative 3, the corrosive and expansive potential of the soils would be addressed in the Final Geotechnical Report and taken into consideration prior to the installation of all underground pipes/clamps/structures. Compliance with standard construction and engineering practices (i.e., onsite excavation requiring suitable engineered stabilization in accordance with the 2016 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. Implementation of these regulations and practices would reduce hazards associated with potential expansive soils or corrosive soils. As such, impacts regarding expansive and corrosive soils would be less than significant and similar under either the Project or Alternative 3.

*(iv) Paleontological Resources*

Under Alternative 3, as with the Project, grading and excavation into native soils would be necessary to provide subterranean parking or building foundations. However, because Alternative 3 would require fewer automobile and bicycle parking spaces, compared to the Project, it is anticipated that Alternative 3 would require only partially subterranean parking levels compared to two subterranean levels under the Project. Both the Project and Alternative 3 would require excavation for building foundations, and both the Project and Alternative 3 have the potential to encounter paleontological resources in previously undisturbed

soils. In addition, the Project Site contains older Quaternary alluvial fan and fluvial deposits that potentially contain fossil specimens, which could also be impacted by excavation activities. Both the Project and Alternative 3 would require the implementation of mitigation measures MM-PALEO-1 through MM-PALEO-3. These mitigation measures would provide for appropriate treatment and/or preservation of resources if encountered. Under either the Project or Alternative 3, potentially significant impacts to paleontological resources would be mitigated to levels that are less than significant. However, because excavation would be less extensive under Alternative 3, impacts would be less than under the Project.

(f) *Greenhouse Gas Emissions*

The construction and occupation of the Project Site under either the Project or Alternative 3 would increase GHG emissions over existing conditions. The Project's net operational emissions of 3,063 MTCO<sub>2</sub>e would be approximately 22 percent below the Project's net operational emissions that would be generated by the Project under the NAT Scenario. Both the Project and Alternative 3 would implement PDF AQ-1 and PDF-GHG-1 to ensure that GHG emissions would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the City's Green Building Ordinance. GHG impacts under either the Project or Alternative 3 would be considered to be less than significant. However, because Alternative 3 would substantially reduce the scale of the Project and the Project's daily VMT and thus mobile emissions, impacts with respect to GHG emissions would be less than under the Project.

(g) *Hydrology and Water Quality*

(i) *Construction*

Construction activities under either the Project or Alternative 3 include excavation and grading, maintenance/operation of construction equipment, potential dewatering, and handling/ storage/disposal of materials. These activities could contribute to pollutant loading in stormwater runoff or groundwater, and potential changes in runoff. In addition, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events. On-site water activities for dust suppression could contribute to pollutant loading in runoff from the construction site. However, either the Project or Alternative 3's potential impacts would be reduced to less-than-significant levels through compliance with the required NPDES permit, including a construction SWPPP and respective BMPs. BMPs would ensure that neither the Project nor Alternative 3 would exceed surface and groundwater water quality standards during construction. BMPs would also control the direction and volume of runoff so that the capacities of existing storm drains would not be exceeded or existing drainage patterns would not be altered. As such, existing regulations, which include implementation of required BMPs, would reduce either the Project or Alternative 3's hydrology and water



quality impacts related to construction to less than significant levels. However, because the duration of construction activities and potential exposure of soils, as well as quantities of excavated materials, would be less under Alternative 3, impacts with respect to hydrology and water quality would be less than under the Project.

#### *(ii) Operation*

The Project and Alternative 3 would have similar building setbacks and would similarly result in approximately 94 percent imperviousness of the Project Site. Both the Project and Alternative 3 would implement the City's LID measures, including biofiltration, rainwater harvesting, and infiltration, which would result in an effective change in Q10 runoff of -0.12 cfs, and effective change in Q50 runoff of 0 cfs. As such, both the Project and Alternative 3 would reduce existing runoff from the Project Site. Compliance with existing LID regulations, such as biofiltration, would ensure that neither the Project nor Alternative 3 would exceed surface and groundwater water quality standards during operation. The required LID would also ensure that the area's existing drainage patterns would not be altered or that the rate and amount of surface runoff would not result in substantial on- or off-site siltation, erosion, or flooding. Therefore, impacts with respect to hydrology and water quality during operation would be less than significant and similar under both the Project and Alternative 3.

#### *(h) Land Use and Planning*

Unlike the Project, Alternative 3 would not require a zone change to create a higher density and intensity of use, thus would have less potential to generate greater environmental effects than under existing conditions. Although most land use plans do not directly address environmental effects, land use and zoning designations are intended to physically organize a community and prevent encroachment of conflicting uses which, thus, would reduce certain environmental effects. Because Alternative 3 would not provide a mix of uses, it would not implement the objectives of the General Plan Framework Element with respect to providing a diversity of uses in accordance with the Project Site's Regional Center Designation. It would not meet the City's land use policies to concentrate of mixed-use development or high-density housing in proximity to a transit station, or within walking distance of a broad range of uses to reduce VMT. Alternative 3 would further the policies of the Health and Wellness Element and the Housing Element's anti-displacement and sustainability standards in replacing the Project Site's existing RSO residential units. Both the Project and Alternative 3 would implement the policies of the 2016 CALGreen Code, the Los Angeles Green Building Code, and LEED building design standards. Both the Project and Alternative 3 would provide bicycle parking spaces, increase existing residential density in proximity to transit, and improve sidewalks and pedestrian safety along Yucca Street, Vista Del Mar Avenue, and Argyle Avenue. As such, both the Project and Alternative 3 would be consistent with the policies of the Hollywood Redevelopment Plan, the City's Mobility Plan

2035, and SCAG RTP/SCS policies to support and encourage a land use pattern and circulation system that supports pedestrians, bicycles, and mass transit in existing urban environments, thus reducing VMT. Overall, the density and location of either the Project or Alternative 3 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 plans would be less than significant. However, because Alternative 3 would not provide a higher concentration of housing and mix of uses compared to the Project, impacts with respect to land use plans would be less under the Project than under Alternative 3.

(i) *Noise*

(i) *Construction*

Under either the Project or Alternative 3, construction activities would require the use of heavy-duty machinery, which would increase noise levels at several sensitive receptor locations in the area. Both the Project and Alternative 3 would implement MM NOI-1, which would provide for sound barriers that would achieve a noise reduction of 15 dBA, MM-NOI-2, which would require equipment noise control, and MM-NOI-3, which would maintain a 15-foot setback between large equipment and adjacent, off-site residences, as well as provide for an on-site construction liaison. Although these mitigation measures would result in a substantial reduction in noise and vibration, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at adjacent residential uses along Vista Del Mar Avenue (Location R3), the residential uses to the west across Argyle Avenue (Location R1), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (Location R4), and those on the north side of Yucca Street (Location R2) even after implementation.

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. However, under the Project or Alternative 4, because MM NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable. Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under both the Project and Alternative 4. However, because the scale of excavation and the use of heavy equipment would be less under Alternative 3, and occur within a

shorter time frame, noise and vibration impacts would be less than under the Project.

*(ii) Operation*

Operation under either the Project or Alternative 3 would increase mobile source noise (traffic) and onsite stationary and composite noise levels compared to existing conditions. Both the Project and Alternative 3 would implement MM-NOI-5, which would require a sound enclosure or equivalent noise-attenuating features at the emergency generator. Composite noise from on-site activities under either the Project or Alternative 3 would not exceed the City's threshold standards. Therefore, with the implementation of MM-NOI-5, stationary-source noise levels under either the Project or Alternative 3 would be less than significant. However, because the scale and occupation of Alternative 3 would be substantially reduced, the size of the emergency generator, other equipment, and general activity would be less than under the Project. Regarding mobile-source noise, Project-related off-site traffic noise increases would not exceed the City's noise threshold standard. However, because vehicle trips would be substantially less under Alternative 3 (fewer than 250 net new daily trips under Alternative 3), mobile noise impacts would be less. As such, although both the Project and Alternative 3 would generate less than significant operation noise impacts, impacts would be less under Alternative 3 than under the Project.

*(j) Population and Housing*

Both the Project and Alternative 3 would incrementally increase population and housing, as well as result in the temporary displacement of tenants currently occupying the Project Site's existing 44 residential units. However, Alternative 3 would not result in the Project's increase in new employees. Alternative 3 would provide 101 new residential units, and generate approximately 138 new residents<sup>38</sup> (245 minus 107 existing residents), compared to the Project, which would provide 210 new residential units and generate approximately 403 new residents (510 minus 107 existing residents) and 99 new employees. With the demolition the existing 44 units, Alternative 3 would result in the net increase of 57 residential units. The Project would result in the net increase of 166 residential units. The Project's increase in residents and employment opportunities, and Alternative 3's increase in residents would be less than significant because the increases would be consistent with SCAG's growth projections, would help the City meet its housing obligation under the SCAG RHNA allocation. However, Alternative 3 would be less consistent since it would not provide the type of transit oriented development encouraged in the General Plan Housing Element and SCAG RTP/SCS policies. With the net increase of dwellings units under either Alternative 3 or the Project, the number of dwelling units that would be temporarily removed represents a small fraction of the housing growth expected Citywide and

<sup>38</sup> Based on the citywide household size of 2.43 persons per household.

would not represent the displacement of a substantial number of existing housing such that the construction of replacement housing elsewhere would be required. Therefore, both the Project and Alternative 3 would have less than significant population and housing impacts. However, because Alternative 3 would not substantially increase residential density in proximity to transit, compared to the Project, it would not meet the objectives of the General Plan Housing Element and SCAG RTP/SCS to the same degree as the Project. As such, impacts with respect to population and housing would be considered less under the Project than under Alternative 3.

(k) *Public Services*

(i) *Fire Protection*

Both the Project and Alternative 3 would involve construction activities and intensify the use of the Project Site so that demand on fire protection and emergency medical services would be increased. As was indicated for the Project, the Project Site is well served by nearby fire stations with adequate ability to serve the site as well as sufficient hydrant water flow to meet the fire-fighting requirements established by the LAFD. Further, the Project and Alternative 3 would have a site design that would be reviewed by LAFD and would be required to provide sufficient accessibility for fire-fighting activities. The Project and Alternative 3 would comply with regulatory measures for safety and would provide additional voluntary provisions for addressing emergency situations with on-site equipment and personnel. Both the Project and Alternative 3 would implement PDF-TRAF-1, to provide a Construction Management Plan to improve access around the construction site. PDF-FIRE-1, implemented under both the Project and Alternative 3, would facilitate occupants' voluntary fire and emergency medical procedures during operation that would reduce demand on the LAFD. With the implementation of PDFs and applicable regulations, neither the Project nor Alternative 3 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither the Project nor Alternative 3 would result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would substantially reduce occupation of the Project Site and would eliminate the Project's high-rise component, impacts with respect to fire protection services would be less than under the Project.

(ii) *Police Protection*

The ratio of officers to service population is used by LAPD as an indicator of the level of service offered, and serves as a basis for measuring the increase in police services demand. Alternative 3 would result in a net increase 57 residential units

and service population of 171;<sup>39</sup> whereas, the Project would generate a service population of approximately 740. Alternative 3 would generate an increase in population from 165,000 residents to 165,171 residents in the Hollywood Community Police Station service area, and would reduce the officer to resident ratio from one officer per 468 residents to one officer per 469 residents, based on 352 sworn officers. With a generation factor of 16 crimes per 1,000 residents, Alternative 3 could potentially result in approximately 3 additional crimes per year (not withstanding proposed PDFs), compared to 12 additional crimes under the Project. The Project and Alternative 3 would implement PDF-POL-1 to increase security and reduce vandalism during construction, and Alternative 3 would implement PDF-POL-3 through PDF-POL-5, to design landscaping to not impede visibility, require participation in community crime prevention efforts, and provide building diagrams to the LAPD. Unlike the Project, Alternative 3 would not require 24-hour surveillance or security cameras. Implementation of applicable PDFs would reduce Alternative 3 and the Project's demand on police services. With implementation of PDFs, neither the Project nor Alternative 3 would increase fire 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, neither the Project nor Alternative 3 would result in potential physical impacts associated with construction of police facilities. Therefore, impacts with respect to police protection would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would generate a lower service population than under the Project, impacts with respect to police protection services would be less under Alternative 3.

### *(iii) Schools*

Alternative 3's 101 residential units are anticipated to generate a net increase of approximately 23 school age children<sup>40</sup> and the Project's 210 residential units would generate a net increase of approximately 52 new school age children. The additional students from the Project or Alternative 3 would attend local schools and have the potential to exceed the number of available seats at local schools. However, pursuant to Section 65995 of the California Government Code, the 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

<sup>39</sup> Based on City CEQA Thresholds Guide, K. Police Service Population Conversion Factor of 3 persons per residential unit.

<sup>40</sup> Student generation rates for multi-family units are 0.1999 elementary students per unit, 0.0546 middle school students per unit, and 0.0943 high school students per unit for high school students. Based on these factors, Alternative 3 (101 units) would generate 20 elementary school students, 6 middle school students, and 10 high school students for an estimated total of 36 students. Subtracting the Project Site's estimated existing students (13), the net total would be 23 students.

and services would be less than significant under either the Project or Alternative 3. However, because Alternative 3 would generate fewer new students, impacts with respect to school services would be less than under the Project.

*(iv) Parks and Recreation*

Both the Project and Alternative 3 would generate new residents, who would increase demand for parks and recreational facilities. Both the Project and Alternative 3 would incorporate open space at or in excess of Code standards. Alternative 3 would provide a gym, community lounge, pool, and amenity deck facing south. Due to the amount, variety, and availability of the open space and recreational amenities under both the Project and Alternative 3, it is anticipated that residents would generally utilize on-site open space to meet their recreational needs. Both the Project and Alternative 3 would comply with LAMC Section 21.10.3 regarding a dwelling unit construction tax of \$200 for each new residential unit for City acquisition of new park space. Furthermore, both the Project and Alternative 3 would meet the applicable requirements set forth in LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space and parkland requirements. Although neither the Project nor Alternative 3 would meet the parkland provision goals set forth in the Public Recreation Plan, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, neither the Project nor Alternative 3 would 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. Impacts with respect to parks and recreation would be less than significant. However, because Alternative 3 would generate less new population, impacts with respect to parks and recreation services would be less than under the Project.

*(v) Libraries*

Both the Project and Alternative 3 would increase demand for library services. However, all of the residential units under either the Project or Alternative 3 would be equipped to use individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. In addition, both the Project and Alternative 3 would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. Based on the above, target service populations, and library sizing standards, operation of either the Project or Alternative 3 would not create any new exceedance of the capacity of local libraries to adequately serve the proposed residential population. Therefore, neither the Project nor Alternative 3 would 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. However, because the Project would generate less new population, impacts with respect to library services would be less than under Alternative 3.

(I) *Transportation*

The following discussion of Project impacts is based on *the Alternatives Analysis Memorandum* prepared by Gibson Transportation Consulting, Inc., which is provided in Appendix L-3 of this EIR. The discussion evaluates the relative differences and similarities between Alternative 3 and the Project.

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

The Project and Alternative 3 would support multimodal transportation options and a reduction in VMT per resident/employee, as well as promote transportation-related safety in the Project area. The Project and Alternative 3 would not conflict with policies of Mobility Plan 2035 adopted to protect the environment and reduce VMT. As with the Project, Alternative 3 would be consistent with applicable transportation goals of the Hollywood Community Plan Objective 6 to coordinate land use densities and to promote the use of transit. The Project and Alternative 3 would not conflict with VisionZero to reduce traffic-related deaths or with LADOT MPP, Section 321, regarding driveway design standards. The Project and Alternative 3 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. As with the Project, Alternative 3 would include bicycle parking spaces for residents, employees, and visitors. The Project and Alternative 3 would also provide for pedestrian improvements, including streetscape and lighting improvements along the street frontages, which would enhance pedestrian safety. The Project and 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 under the Project and Alternative 3.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

With the overall reduction in development on the Project Site that would occur under Alternative 3 compared with the Project, Alternative 3 would generate fewer than 250 net new daily trips based on the City's VMT Calculator. As such according to LADOT's TAG, no further VMT analysis is required and impacts are considered less than significant. Thus, Alternative 3 would generate less VMT than would occur under the Project and no mitigation would be required to reduce VMT under

Alternative 3. Thus, Alternative 3 would result in less impacts with regard to VMT than the Project.

*(iii) Design Hazards*

The Project and Alternative 3 would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. Total existing curb cuts would be reduced from five to a total of three. 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. The Project and Alternative 3 would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. They would also contribute to overall walkability through enhancements to the Project Site and streetscape and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant and similar under the Project and Alternative 3.

*(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. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project or 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, the Project and Alternative 3 would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access would be less than significant and similar under the Project and Alternative 3.

*(m) Tribal Cultural Resources*

The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment indicated no known Tribal cultural resources within the Project Site or surrounding area. However, excavations associated with the Project could have a potential, albeit a low potential, to encounter previously unknown and buried Tribal cultural resources. In the unlikely event that buried Tribal cultural resources are encountered during construction, 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. The Project and Alternative 3



require the same scale of site preparation and surface grading and, as such, would have similar opportunity to uncover any potential Tribal cultural resources. Compliance with the City's standard Conditions of Approval would ensure that both the Project and Alternative 3 would result in similar and less than significant impacts with respect to Tribal cultural resources.

(n) *Utilities and Service Systems – Water, Wastewater, Solid Waste*

(i) *Water Supply*

Alternative 3 would generate demand for water resources, as shown in **Table V-7, Alternative 3 Estimated Wastewater Generation and Water Use**. As shown in Table V-7, Alternative 3 would require 13,988 gpd without conservation and 11,350 gpd with conservation. The net increase, achieved by subtracting existing uses would be 4,094 gpd or 4.54 AFY. By comparison, the Project would require approximately 62,995 gpd or approximately 67.13 AFY.<sup>41</sup> The water supply analysis for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. The water supply analysis for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. Because Alternative 3 would substantially reduce the Project's water demand, it is assumed that LADWP would also have sufficient supply for the Alternative. As with the Project, Alternative 3 would include numerous design features to reduce the demand for water consumption. Water infrastructure and water supply would be sufficient to meet the demands of both the Project and Alternative 3 without mitigation and, as such, both the Project and Alternative 3 would have a less than significant impact with respect to water services. However, because Alternative 3 would generate a lower water demand than the Project, impacts would be less than under the Project.

(ii) *Wastewater*

Both the Project and Alternative 3 would increase wastewater generation over existing conditions; thus, increasing demand on the existing Hyperion Treatment Conveyance System or Hyperion Treatment Plant. As shown in Table V-7, Alternative 3 would generate approximately 10,990 gpd, with a net increase (subtracting existing uses) of 4,910 gpd. By comparison the Project is estimated to increase on-site wastewater generation by approximately 62,995 net gpd.<sup>42</sup> The Project's additional wastewater generation would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Wastewater generation under Alternative 3 would a fraction of the wastewater generated by the Project. Because the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant have adequate capacity to serve the Project, it would

<sup>41</sup> See Table IV.N.1-8, *Estimated Domestic Water Demand for Project*, in Section IV.N.1 of this Draft EIR.

<sup>42</sup> See Table IV.N.1-7, *Wastewater Generated During Operation*, in Section IV.N.1 of this Draft EIR.

also have sufficient capacity to serve Alternative 3. Impacts with respect to wastewater treatment and conveyance under both the Project and Alternative 3 would be less than significant. However, because Alternative 3 would generate substantially less wastewater than under the Project, impacts with respect to wastewater conveyance and treatment systems would be less.

**TABLE V-7  
ALTERNATIVE 3 ESTIMATED WASTEWATER GENERATION AND WATER USE**

Land Use	Quantity	Factor (gpd) <sup>a</sup>	Wastewater Generation (gpd)	Daily Water Demand (gpd) <sup>b</sup>	Annual Water Demand (AFY) <sup>c</sup>
<b>Existing Uses</b>					
			6,080	7,296	8.17
<b>Proposed Uses</b>					
Residential: Apartment – Bachelor/Studio	36 units	80 gpd/unit	2,880	3,456	3.87
Residential: Apartment – 1 Bedroom	41 units	110 gpd/unit.	4,510	5,412	6.06
Residential: Apartment – 2 Bedroom	24 units	150 gpd/unit	3,600	4,320	4.84
Parking Structure	40,000 sf	20 gpd/ 1,000 sf		800	0.90
<b>Subtotal</b>			<b>10,990</b>	<b>13,988</b>	<b>15.67</b>
<i>Less Additional Conservation (20%)<sup>d</sup></i>				-2,638	-2.95
<b>Total</b>				<b>11,350</b>	<b>12.71</b>
<b>Net Increase (Proposed – Existing)</b>			<b>4,910</b>	<b>4,094</b>	<b>4.54</b>

Note: d.u. = dwelling unit; sf = square feet; gpd = gallons per day; afy = acre feet per year.

a Wastewater generation factors obtained from the Project's Sewer Capacity Availability Report (SCAR), prepared by the City of Los Angeles Bureau of Engineering, processed on December 4, 2015 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential Categories, dated April 6, 2012.

b Water demand is consistent with wastewater generation. To be conservative, 20 percent was added to account for outdoor water use.

c An acre-foot equals approximately 325,851 gallons

d Estimated 20 percent water use reduction due to additional water conservation commitments agreed by the Project applicant: installation of waterless urinals; 1.75 gpm for shower heads; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible. The parking structure is excluded from this reduction as water conservation measures do not apply.

Source: ESA, 2020.

(iii) *Solid Waste*

Both the Project and Alternative 3 would generate approximately 3,307 tons of C&D waste associated with demolition. However, because the building size would be substantially reduced, Alternative 3 would generate substantially less C&D waste associated with building construction. Demolition and construction waste 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, although less under Alternative 3.

As shown in **Table V-8, *Alternative 3 Estimated Solid Waste Generation - Operation***, Alternative 3 would generate 697 pounds per day and 127.2 tons per year. Based on Citywide diversion rates of at least 76.4 percent, Alternative 3's solid waste generation would be reduced to 164.5 pounds per day and 30.01 tons per year. Taking into consideration the City's diversion rate of 76.4 percent, the Project would generate a net increase of 622 pounds per day and 113.55 tons of solid waste per year.<sup>43</sup> The Project's annual solid waste generation with diversion, would be approximately 0.001 percent of the County's annual waste generation and would account for less than 0.0001 percent of the remaining capacity. Respectively, with diversion, Alternative 3's annual solid waste generation would be approximately 0.0003 percent of the County's annual waste generation and less than 0.00002 percent of the remaining capacity.<sup>44</sup> Because of the small increase in waste disposal represented by either the Project or Alternative 3, neither would 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. As such, impacts with respect to solid waste generation would be less than significant. However, because Alternative 3 would generate substantially less solid waste than under the Project, impacts with respect to waste disposal would be less.

<sup>43</sup> See Table IV.N.1-11, *Estimated Operational Solid Waste Generation*, in Section IV.N.1 of this Draft EIR.

<sup>44</sup> The estimated Los Angeles County annual disposal rate is estimated to be 9.457 million tons per year and the remaining capacity is estimated to be 114 million tons

**TABLE V-8**  
**ALTERNATIVE 3 ESTIMATED OPERATION SOLID WASTE GENERATION**

Land Uses	Quantity (units/sf)	Factor <sup>a</sup>	Solid Waste Generated (lbs/day) <sup>a</sup>	Solid Waste Generated (tons/year) <sup>d</sup>
<b>Existing</b>			538	98.2
<b>Alternative 3</b>				
Residential	101 units	12.23 lbs./unit	1,235	225.4
<b>Net Increase (Proposed minus Existing)</b>			<b>697</b>	<b>127.2</b>
<b>With 76.4% Diversion</b>			<b>164.5</b>	<b>30.01</b>

a Generation factors provided by CalRecycle at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed January 2019.

SOURCE: ESA, 2020.

(o) *Utilities and Service Systems – Energy Infrastructure*

Alternative 3, as with the Project, would utilize energy infrastructure to accommodate its 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. 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

Alternative 3, the No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative, would consist of 101 rental units, but would not incorporate commercial or hotel uses and, as such, would not represent a mixed-use. The number of residential units provided under Alternative 3 would be less than half of the Project's proposed 210 residential units. However, because Alternative 3 would add to the City's stock of RSO units and would upgrade the character of the Project Site, it would be consistent with the Project objectives listed below, although not to the same degree as the Project:

**Objective 4:** To provide a diverse mix of dwelling units that appeal to a range of household sizes to help meet the critical demand for new housing in the Hollywood Community Plan area.

**Objective 5:** To increase the City's stock of rent controlled units under the City's RSO through a project that provides 100 percent of its residential apartment units as RSO units.

**Objective 6:** To provide a right of return for residents of existing onsite residential apartment units subject to the Rent Stabilization Ordinance.

Because Alternative 3 is not a mixed use, or contain a commercial component, it would not meet any of the following objectives:

**Objective 1:** To construct an infill development that balances commercial and residential uses by providing a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the Project Site area.

**Objective 2:** To redevelop the underutilized Project Site at a density envisioned for a Transit Priority Area in the Regional Center and Hollywood Center designations on and surrounding the Project Site, with an economically viable and attractive transit-oriented high-density mixed-use development.

**Objective 3:** To promote and support local and regional mobility, greenhouse gas and air quality objectives to reduce vehicle miles traveled, reduce reliance on single-passenger vehicles and increase the use of public transit, and maximize infill development by constructing a high-density residential, hotel and commercial/restaurant mixed-use development on a site within a designated Transit Priority Area that is located within one-quarter mile of key public transit facilities, including the Hollywood and Vine Red Line Station.

**Objective 7:** To support job creation and to increase business opportunities within Los Angeles by developing the Project's hotel and commercial/restaurant uses on a site well-served by transit.

**Objective 8:** To revitalize the streetscape surrounding the Project Site and encourage pedestrian activity and bicycle use by creating a streetscape design that allows for outdoor café tables, parkway planters and bicycle parking within an overall landscape design that integrates the Project development into the surrounding urban neighborhood.

## d) **Alternative 4: Primarily Office Mixed-Use Alternative**

### (1) Description of the Alternative

The Primarily Office Mixed-Use Alternative (Alternative 4) would consist of an approximately four-story commercial building (Building 1) in the West Parcel and a three-story, 13-unit condominium building (Building 2) in the East Parcel. The residential units would be intended for purchase and, as such, would not be RSO units. The West Parcel's commercial building would provide approximately 100,000 square feet of office space, 3,000 square feet of retail space, and 9,000 square feet of restaurant space. The total floor area of the commercial building would be approximately 112,000 square feet. The East Parcel, which comprises approximately 10,941.9 square feet, would be used for development of the residential component. The residential building would be similar to the Project's Building 2. The residential density (13 units) would be consistent with the existing R3 zone, which requires a minimum of 800 square feet of lot area per unit. Setbacks from lot lines would be similar to those of the Project and consisted with the respective zoning designation. The FAR for Alternative 4 (averaged over the Project Site) would be approximately 3.81:1, compared to the Project's FAR of 6.6:1.

Alternative 4 would require approximately 250 automobile parking spaces, compared to a total of 436 spaces required for the Project.<sup>45</sup> Alternative 4 would also provide 56 bicycle parking spaces, compared to 257 bicycle parking spaces under the Project. LAMC required parking is outlined in **Table V-9, Alternative 4 Code-Required Automobile and Bicycle Parking**, below. Parking would be located in a subterranean parking structure, accessed via single driveways on Argyle Avenue and Yucca Street. Parking for Building 1 would be located in a subterranean structure accessed via driveways from Argyle Avenue and Yucca Street. Parking for Building 2 would be located within two levels of subterranean and a semi-subterranean parking level below Building 2. The Building 2 parking structure would be accessed from Vista Del Mar Avenue.

<sup>45</sup> The total parking spaces for the Project reflects reductions allowed under the LAMC for the provision of bicycle parking.

**TABLE V-9**  
**ALTERNATIVE 4 CODE-REQUIRED AUTOMOBILE AND BICYCLE PARKING**

Unit Type	Factor		Number of Units or Floor Area		Required Parking
Automobile Parking Building 1:[a]					
Office Floor Area	1 space/500 sf		100,000 sf		200 spaces
Retail Floor Area	1 space/500 sf		3,000 sf		6 spaces
Restaurant Floor Area	1 space/500 sf		9,000 sf		18 spaces
Building 1 Subtotal:					224 spaces
Automobile Parking Building 2:					
Condominium Units	2 spaces per unit		13		26
Building 2 Subtotal:					26 spaces
Total Automobile Parking					250 spaces
Bicycle Parking:[b]					
	Long-Term Factor	Long Term Spaces	Short-Term Factor	Short-Term Spaces	Total spaces
Bicycle Parking Building 1:					
Office Floor Area	1 space per 5,000 sf	20	1 space per 10,000 sf	10	30 spaces
Retail/Restaurant Floor Area	1 space per 2,000 sf	6	1 space per 2,000 sf	6	12 spaces
Building 1 Bicycle Parking:		26		16	42 spaces
Building 2:					
Up to 25 units	1 space per unit	13 spaces	1 space per ten units	1	14 spaces
Building 2 Bicycle Parking:		13		2	15 spaces
Total Bicycle Parking		39		18	56 spaces

[a] Per LAMC Sec. 12.21.A.4

[b] Per LAMC Sec. 12.21.A.16(a)(l)(i)

SOURCE: ESA, 2020

## (2) Environmental Impacts

### (a) *Aesthetics/Visual Resources*

Senate Bill (SB) 743 and Zoning Information File No. 2452 (ZI No. 2452) provide that a mixed-use project in a designated urban TPA site is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Although the Project meets this criterion, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, and light/glare.

#### (i) *Views*

Alternative 4 would reduce the Project's maximum building height from 20 stories to a maximum of four stories. Building setbacks would be similar to those proposed under the Project and consistent with existing zoning requirements. Neither the Project nor Alternative 4 would substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views. Neither would block panoramic views that occur in the background of open street corridors (such as views of the Hollywood Sign through north-facing Gower Street). No existing views across the Project Site of the Capitol Records Building or other scenic resources are available and, as such, Alternative 4 would not impact views of these resources. Because the reduced building height, Alternative 4 would be less visible than the Project from the Jerome D. Daniel Overlook above the Hollywood Bowl and other areas along Mulholland Drive, and would have less effect on vistas of the Los Angeles Basin. View impacts would be less than significant under both the Project and Alternative 4; however, Alternative 4 would result in less impact with respect to views because of its lower height. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project shall not be considered significant pursuant to SB 743 and ZI No. 2452.

#### (ii) *Scenic Resources*

The Project Site is not located along, or within the view field of, a state scenic highway and, with the exception of two small street trees along the Project's Argyle Avenue right-of-way (ROW) and three palm trees along the Project's Vista Del Mar ROW does not contain scenic resources such as trees or rock outcroppings. The Project Site is located within and adjacent to the Vista Del Mar/Carlos Historic District. The two on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Historic District, are considered to longer contribute to the scenic historical character of the District. As such, removal of these buildings would not directly impact a scenic resource. Two on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Historic District, are considered to longer contribute to the scenic historical character of the District. As such, removal of these buildings would not directly impact a scenic resource. Potential indirect aesthetic impacts on the Historic District would be addressed



through the conceptual design of Building 2 which would emulate elements of a traditional Prairie style consistent with District's Craftsman design. Overall, the Project Site has limited visual quality and does not contain significant aesthetic or visual resources. Therefore, development under either the Project or Alternative 4 would not substantially damage scenic resources, including historical buildings, that contribute to the area's scenic value and, as such, impacts with respect to scenic resources would be less than significant. However, because Alternative 4 would reduce the height of both Buildings 1 and 2, it would have less contrast with the scale of the Historic District and would reduce the Project's less than significant indirect impact. With the exception of aesthetic impacts on historic scenic resources, this analysis is provided for informational purposes only. The aesthetics impacts of the Project are not considered significant pursuant to SB 743 and ZI No. 2452.

*(iii) Consistency Regulations that Govern with 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. The Project and Alternative 4 would comply with the City's street tree requirements and comply with exterior lighting in compliance with LAMC regulations, and would comply with signage regulations set forth under the Hollywood Signage SUD. In addition, the Project and 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 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. The Project and 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, because neither the Project nor Alternative 4 would conflict with the LAMC, Hollywood Signage SUD, or the applicable Community Plan open space policy, impacts would be less than significant and similar under the Project and Alternative 4.

*(iv) Visual Character and Quality*

The potential for a project to degrade the existing visual character or quality of public views the site and its surroundings is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

Under existing conditions, the on-site multi-family apartment buildings are well-kept, but do not possess significant architectural, historical or otherwise significant aesthetic character. At present, the Yucca Street frontage is visually dominated by

older utility poles and overhead power lines. Adjacent sidewalks are in disrepair and the street lacks amenities such as street trees and security/ pedestrian lighting that would support pedestrian traffic along Yucca Street between Vista Del Mar Avenue and Argyle Avenue. Both the Project and Alternative 4 would replace the chain link-fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue with a landscaped residential use and implement PDF-AES-1 and PDF-AES-2. PDF-AES-1 would require overhead utility lines to be located underground and PDF-AES-2 would require construction fencing to reduce visual impacts of the Project's construction site. Both the Project and Alternative 4 would improve the street front with improved sidewalks, landscaping, street trees, and security lighting. As with the Project, street-oriented commercial uses would enhance the public interface. Neither the Project nor Alternative 4 would substantially degrade the existing visual character or quality of the site and its surroundings. Impacts under both the Project and Alternative 4 would be less than significant. However, because of the reduction in building height, Alternative 4 would have less contrast with respect to the adjacent single-family neighborhood and, as such, impacts with respect to visual character would be less than under the Project.

*(v) Light and Glare*

Exterior light sources under Alternative 4 would include security and landscaping lighting. Lighting would primarily consist of a mix of standard incandescent light fixtures, as well as various types of efficient/low energy fixtures. Both the Project and Alternative 4 would implement PDF-AES-3, which requires that outdoor lighting along streets to be placed to minimize visibility from adjacent residential uses, would be implemented. Lighting would be designed and strategically placed to minimize glare and light spill onto adjacent properties. Because of Alternative 4's reduced building height, the potential for glare from reflected sunlight would be less than under the Project. With implementation of applicable PDFs, the Project and Alternative 4 would result in less than significant impacts related to light and glare. However, because commercial uses would be eliminated and the scale of Alternative 4 relative to the Project would be substantially reduced, light and glare impacts would be less under Alternative 4. Pursuant to SB 743 and ZI No. 2452, light and glare impacts would not be considered significant.

*(b) Air Quality*

*(i) Consistency with Air Quality Management Plan*

The Project and Alternative 4 would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during construction, including compliance with SCAQMD Rule 403, CARB off-road diesel standards, L.A. Green Building Code, Air Pollutions Control Officers Association (CAPCOA) recommendations, and Green Building Measures under PDF-AQ-1. Both the Project and Alternative 4 would be consistent with the applicable growth

projections and control strategies used in the development of the AQMP, and would not jeopardize attainment of the air quality levels identified in the Plan. During operation, both the Project and Alternative 4 would incorporate control strategies set forth in the AQMP such as location efficiency, increased density, transit accessibility, improved development design, and other measures. Both the Project and Alternative 4 would be consistent with the City's growth projections and policies of the General Plan Air Quality Element for achieving emission reduction goals. As such, impacts with respect to consistency with AQMP and General Plan air quality policies would be less than significant and similar under both the Project and Alternative 4.

*(ii) Violation of Air Quality Standard/Emissions*

(a) Construction

Both the Project and Alternative 4's construction phases have the potential to generate emissions, including TACs, through the use of heavy-duty construction equipment, generation of construction traffic, fugitive dust emissions, paving operations, and the application of architectural coatings and other building materials. Both the Project and Alternative 4 would implement Mitigation Measure MM-AQ-1 to require off-road diesel-powered equipment to meet the CARB and USEPA Tier 4 standards and to use pole power to the extent feasible, which would reduce potentially significant regional construction impacts to a less than significant level. As with the Project, Alternative 4's maximum daily localized construction emissions would not exceed the localized thresholds for CO, NOX, PM10, and PM2.5. Therefore, similar to the Project, localized construction emission impacts under alternative 4 on sensitive receptors would be less than significant. Also, the qualitative assessment as well as the health risk modeling concluded that TAC emissions from the Project's construction activities would not expose sensitive receptors to substantial TAC concentrations. Although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations. Alternative 2 would result in similar construction-related TAC effects to sensitive receptors. However, Alternative 4 would require less earthwork for parking facilities and would represent less than half of the Project's total building size. Alternative 4's smaller scale would reduce the duration of construction and, as such, construction emissions would be less than under Alternative 4.

(b) Operation

The Project and Alternative 4, both of which would generate stationary and mobile emissions during operation, would implement PDF-AQ-1. PDF-AQ-1 requires energy efficiency features, such as reductions in building energy and resource consumption with energy efficient appliances and reduced building energy usage sufficient to meet the applicable Title 24 standard. Reductions include compliance

with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content. With implementation of PDF-AQ-1, maximum daily net operational emissions, under either the Project or Alternative 4 would not exceed the SCAQMD numeric thresholds for air pollutants. Because neither the Project nor Alternative 4 would exceed SCAQMD numeric thresholds for air pollutants with regard to regional, localized or TAC emissions, as well as CO Hotspots, operational air quality impacts would be less than significant. However, because Alternative 4 would be smaller, would have less occupancy, and would reduce daily vehicle trips compared to the Project (Alternative 4 would generate 9,458 total daily VMT versus the Project, which would generate 11,929 total daily VMT), Alternative 4 would generate fewer operation and mobile emissions compared to the Project. As such, emissions generated during operation would be less under Alternative 4 than under the Project.

(c) *Cultural Resources*

(i) *Historical Resources*

Both the Project and Alternative 4 would demolish two on-site buildings located within the Vista Del Mar/Carlos Historic District. These buildings, however, are not considered contributors to the Historic District and demolition of such is not considered to destroy or alter any primary character-defining features of the Historic District. The scale of the Project has the potential to contrast with the Historic District's one- and two-story single-family homes, and could indirectly impact the Historic District. In this regard, the Project's and three-story Building 2 would provide a transitional buffer between the 20-story, contemporary tower (Building 1) and the adjacent Historic District. Although the Project and would conform with Secretary of the Interior's Standards and, as such, would result in a less than significant historical resources impact, Alternative 4 would reduce the Project's 20-story tower component and would be more consistent with the scale of the Historic District. As such, although both the Project and Alternative 4 would result in less than significant historical resources impacts, indirect impacts on the Historic District would be less under Alternative 4.

(ii) *Archaeological Resources*

Under Alternative 4, as with the Project, grading and excavation into native soils would be necessary to provide subterranean parking or building foundations. However, because Alternative 4 would require fewer automobile and bicycle parking spaces, compared to the Project, it is anticipated that Alternative 4 would require less excavation for subterranean levels. Both the Project and Alternative 4 would require excavation for building foundations and both the Project and Alternative 4 have the potential to encounter archaeological resources in previously undisturbed soils. Both the Project and Alternative 4 would require the implementation of mitigation measures MM-ARCH-1 through MM-ARCH-3. These mitigation measures would provide for appropriate treatment and/or preservation

of resources if encountered. Under either the Project or Alternative 4, potentially significant impacts to archaeological resources would be mitigated to levels that are less than significant. However, because excavation would be less extensive under Alternative 4, impacts would be less than under the Project.

(d) *Energy*

Both Alternative 4 and the Project would increase demand for electricity, natural gas, and transportation energy, during construction and operation. The Project would increase annual electricity consumption by 3,417,600 kWh per year (representing approximately 0.013 percent of LADWP's projected sales in 2021) and would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas's planning area. Acknowledging that the Project would have a higher total floor area than Alternative 4, and the mix of uses would vary, Alternative 4's energy demand and energy conservation features would not be materially different from the Project such that it would cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. As with the Project, impacts related to efficient energy consumption would be less than significant. The location of the Project and Alternative 4 on an infill site in a Transit Priority Area and a High Quality Transit Area and in proximity to existing high-quality transit stops, entertainment, and commercial uses, would achieve a reduction in VMT greater than the Hollywood Community Plan, City, and statewide averages.

Also, because both the Project and Alternative 4 would incorporate a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand, neither would conflict with applicable state and local conservation plans. Thus, 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.

(e) *Geology, Soils, and Paleontological Resources*

(i) *Exacerbation of Existing Environmental Conditions*

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault and, as such, requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface displacement from the fault.<sup>46</sup> However, Geotechnical faulting investigations have indicated that no active faulting, including the Hollywood Fault,

<sup>46</sup> Earthquake Fault Zones, Special Publication 42, Interim Revised 2018, prepared by Department of Conservation, California Geological Survey, <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>, accessed October 2018.

occurs beneath or projects toward the Project Site.<sup>47</sup> Although the Project Site is subject to potential earthquake ground shaking, implementation of applicable LAMC Chapter IX (Building Code) seismic design provisions would require the latest seismic design standards for structural loads and materials, and accommodate maximum ground accelerations from known faults. Respectively, a design-level geotechnical report, applicable to either the Project or Alternative 4, will be required to develop geotechnical recommendations for final design, including drilling and sampling geotechnical borings and detailed engineering analyses. With implementation of applicable regulations and recommendations of the geotechnical report, impacts with respect to ground shaking under either the Project or Alternative 4 would be less than significant. Although the Project Site is located within an area susceptible to liquefaction,<sup>48</sup> site-specific liquefaction analysis indicates that the Project Site is primarily underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral spreading.<sup>49</sup> The Project or Alternative 4's excavation for the subterranean parking or building foundations would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC requirements. 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.<sup>50</sup> Application of appropriate engineering controls and compliance with regulations for planned excavation and construction activities under either the Project or Alternative 4 would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of the Project or Alternative 4 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 the exacerbation of existing environmental conditions. Impacts related to existing fault rupture, seismic shaking, liquefaction, or other geologic conditions would be less than significant under either the Project or Alternative 4. However, because Alternative 4 would be substantially smaller and require less earthwork than Project, impacts with respect to environmental conditions are considered less than under the Project.

### *(ii) Unstable Geologic Units*

The Project and Alternative 4 would require foundation excavations. Per Code requirements, prior to issuance of a grading permit for either the Project or Alternative 4, a qualified geotechnical engineer must prepare and submit to the

<sup>47</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, pages 7-8, March 2019. Contained in Appendix F of this Draft EIR.

<sup>48</sup> City of Los Angeles General Plan, Safety Element, Exhibit B (shown in Figure IV.D-5 of this Draft EIR).

<sup>49</sup> Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, page 9, March 2019. Contained in Appendix F of this Draft EIR.

<sup>50</sup> Group Delta, Op. Cit., page 9.

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. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts with respect to unstable geologic units would be less than significant under either the Project or Alternative 4. However, because Alternative 4 would involve less excavation and shallower foundation structures, impacts with respect to unstable geologic units would be less than under the Project.

*(iii) Expansive Soils*

Under either the Project or Alternative 4, the corrosive and expansive potential of the soils would be addressed in the Final Geotechnical Report and taken into consideration prior to the installation of all underground pipes/clamps/structures. Compliance with standard construction and engineering practices (i.e., onsite excavation requiring suitable engineered stabilization in accordance with the 2016 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. Implementation of these regulations and practices would reduce hazards associated with potential expansive soils or corrosive soils. As such, impacts regarding expansive and corrosive soils would be less than significant and similar under either the Project or Alternative 4.

*(iv) Paleontological Resources*

Under Alternative 4, as with the Project, grading and excavation into native soils would be necessary to provide subterranean parking or building foundations. However, because Alternative 4 would require fewer automobile and bicycle parking spaces, compared to the Project, it is anticipated that Alternative 4 would require less excavation for subterranean levels. Both the Project and Alternative 4 would require excavation for building foundations and both the Project and Alternative 4 have the potential to encounter paleontological resources in previously undisturbed soils. In addition, the Project Site contains older Quaternary alluvial fan and fluvial deposits that potentially contain fossil specimens, which could also be impacted by excavation activities. Both the Project and Alternative 4 would require the implementation of mitigation measures MM-PALEO-1 through MM-PALEO-3. These mitigation measures would provide for appropriate treatment and/or preservation of resources if encountered. Under either the Project or Alternative 4, potentially significant impacts to paleontological resources would be mitigated to levels that are less than significant. However, because excavation would be less extensive under Alternative 4, impacts would be less than under the Project.

(f) *Greenhouse Gas Emissions*

The construction and occupation of the Project Site under either the Project or Alternative 4 would increase GHG emissions over existing conditions. The Project's net operational emissions of 3,063 MTCO<sub>2</sub>e, would be approximately 22 percent below the Project's net operational emissions that would be generated by the Project under the NAT Scenario. Both the Project and Alternative 4 would implement PDF AQ-1 and PDF-GHG-1 to ensure that GHG emissions would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the City's Green Building Ordinance. GHG impacts under either the Project or Alternative 4 would be considered to be less than significant. However, because Alternative 4 would reduce the scale of the Project and the Project's daily VMT and thus mobile emissions, impacts with respect to GHG emissions would be less than under the Project.

(g) *Hydrology and Water Quality*

(i) *Construction*

Construction activities under either the Project or Alternative 4 include excavation and grading, maintenance/operation of construction equipment, potential dewatering, and handling/ storage/disposal of materials. These activities could contribute to pollutant loading in stormwater runoff or groundwater, and potential changes in runoff. In addition, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events. On-site water activities for dust suppression could contribute to pollutant loading in runoff from the construction site. However, either the Project or Alternative 4's potential impacts would be reduced to less-than-significant levels through compliance with the required NPDES permit, including a construction SWPPP and respective BMPs. BMPs would ensure that neither the Project nor Alternative 4 would exceed surface and groundwater water quality standards during construction. BMPs would also control the direction and volume of runoff so that the capacities of existing storm drains would not be exceeded or existing drainage patterns would not be altered. As such, existing regulations, which include implementation of required BMPs, would reduce either the Project or Alternative 4's hydrology and water quality impacts related to construction to less than significant levels. However, because the duration of construction activities and potential exposure of soils, as well as quantities of excavated materials, would be less under Alternative 4, impacts with respect to hydrology and water quality would be less than under the Project.

(ii) *Operation*

The Project and Alternative 4 would have similar building setbacks and would similarly result in approximately 94 percent imperviousness of the Project Site. Both the Project and Alternative 4 would implement the City's LID measures,



including biofiltration, rainwater harvesting, and infiltration, which would result in an effective change in Q10 runoff of -0.12 cfs, and effective change in Q50 runoff of 0 cfs. As such, both the Project and Alternative 4 would reduce existing runoff from the Project Site. Compliance with existing LID regulations, such as biofiltration, would ensure that neither the Project nor Alternative 4 would exceed surface and groundwater water quality standards during operation. The required LID would also ensure that the area's existing drainage patterns would not be altered or that the rate and amount of surface runoff would not result in substantial on- or off-site siltation, erosion, or flooding. Therefore, impacts with respect to hydrology and water quality during operation would be less than significant and similar under both the Project and Alternative 4.

(h) *Land Use and Planning*

Alternative 4 would not require a Height District Change or Conditional Use Permit to average FAR over the Project Site. Although most land use plans do not directly address environmental effects, land use and zoning designations are intended to physically organize a community and prevent encroachment of conflicting uses which, thus, would reduce certain environmental effects. Because Alternative 4 would substantially reduce residential occupation compared to the Project, it would not meet the City's land use policies to concentrate or high-density housing in proximity to a transit station, or within walking distance of a broad range of uses to reduce VMT. However, Alternative 4 would generate approximately 512 employees (see Subsection (j), *Population and Housing*, below) and would, thus, be consistent with the densification of activity within a Regional Center and in proximity to transit, which would also reduce VMT. Alternative 4 would not further the policies of the Health and Wellness Element and the Housing Element's anti-displacement and sustainability standards in replacing the Project Site's existing RSO residential units. Both the Project and Alternative 4 would implement the policies of the 2016 CALGreen Code, the Los Angeles Green Building Code, and LEED building design standards. Both the Project and Alternative 4 would provide bicycle parking spaces, and improve sidewalks and pedestrian safety along Yucca Street, Vista Del Mar Avenue, and Argyle Avenue. Both the Project and Alternative 4 would be consistent with the policies of the Hollywood Redevelopment Plan, the City's Mobility Plan 2035, and SCAG RTP/SCS policies to support and encourage a land use pattern and circulation system that supports pedestrians, bicycles, and mass transit in existing urban environments, thus reducing VMT. Overall, the density and location of either the Project or Alternative 4 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 plans would be less than significant. However, because Alternative 4 would not provide replacement housing as under the Project, impacts with respect to land use plans would be less under the Project than under Alternative 4.

*(i) Noise**(i) Construction*

Under either the Project or Alternative 4, construction activities would require the use of heavy-duty machinery, which would increase noise levels at several sensitive receptor locations in the area. Both the Project and Alternative 4 would implement MM NOI-1, which would provide for sound barriers that would achieve a noise reduction of 15 dBA, MM-NOE-2, which would require equipment noise control, and MM-NOI-3, which would maintain a 15-foot setback between large equipment and adjacent, off-site residences, as well as provide for an on-site construction liaison. Although these mitigation measures would result in a substantial reduction in noise and vibration, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at adjacent residential uses along Vista Del Mar Avenue (Location R3), the residential uses to the west across Argyle Avenue (Location R1), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (Location R4), and those on the north side of Yucca Street (Location R2) even after implementation.

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. However, under the Project or Alternative 4, because MM NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable. Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under both the Project and Alternative 4. Construction activities under either the Project or Alternative 4 would result in significant and unavoidable noise and vibration impacts. However, because the scale of excavation and the use of heavy equipment would be less under Alternative 4, and occur within a shorter time frame, noise impacts would be less than under the Project.

*(ii) Operation*

Operation under either the Project or Alternative 4 would increase mobile source noise (traffic) and onsite stationary and composite noise levels compared to existing conditions. Both the Project and Alternative 4 would implement MM-NOI-5, which would require a sound enclosure or equivalent noise-attenuating features at the emergency generator. Composite noise from on-site activities under either

the Project or Alternative 4 would not exceed the City's threshold standards. Therefore, with the implementation of MM-NOI-5, stationary-source noise levels under either the Project or Alternative 4 would be less than significant. However, because the scale and occupation of Alternative 4 would be reduced, the size of the emergency generator, other equipment, and general activity would be less than under the Project. Regarding mobile-source noise, Project-related off-site traffic noise increases would not exceed the City's noise threshold standard. However, because daily would be less under Alternative 4 (Alternative 4 would generate 9,458 total daily VMT versus the Project, which would generate 11,929 total daily VMT), mobile noise impacts would be less. As such, although both the Project and Alternative 4 would generate less than significant operation noise impacts, impacts would be less under Alternative 4 than under the Project.

(j) *Population and Housing*

Both the Project and Alternative 4 would incrementally increase population, housing, and employment as well as result in the temporary displacement of tenants currently occupying the Project Site's existing 44 residential units. Alternative 4 would provide 13 new residential units, which would generate 32 residents,<sup>51</sup> compared the existing occupancy of the Project of approximately 107 residents. As such, Alternative 4 would result in a net decrease of 31 residential units and 74 residents. Alternative 4's office uses would generate approximately 479 employees<sup>52</sup> and the restaurant/retail uses would generate approximately 33 employees. Alternative 4's total occupation of approximately 437 occupants (512 employees and 32 new residents, minus 107 existing residents) employees would only be incrementally less than the Project's total occupancy of 403 residents and 99 employees (502 occupants). Because increases would be consistent with SCAG's growth projections, both the Project and Alternative 4's increases in employment opportunities would be less than significant. Alternative 4's removal and non-replacement of RSO units and net decrease of dwellings units Alternative 4, however, would be less consistent with housing policies encouraged in the General Plan Housing Element and would require replacement RSO housing elsewhere. Removed dwelling units would represent a small fraction of the housing growth expected Citywide and, as such, the displacement would not substantial so that the construction of replacement housing elsewhere would be required. Although both the Project and Alternative 4 would have less than significant population and housing impacts, because Alternative 4 would not provide replacement for existing RSO units, impacts with respect to population and housing would be considered greater under Alternative 4 than under the Project.

<sup>51</sup> Based on the citywide household size of 2.43 persons per household.

<sup>52</sup> The employee generation factors for office (0.00479/sf = 479) and restaurant uses (0.00271/sf = 33) is taken from the Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. As a separate rate is not provided for commercial and restaurant uses, the retail factor (Neighborhood Shopping Centers) was used.

(k) *Public Services*

(i) *Fire Protection*

Both the Project and Alternative 4 would involve construction activities and higher occupancy of the Project Site so that demand on fire protection and emergency medical services would be increased. As was indicated for the Project, the Project Site is well served by nearby fire stations with adequate ability to serve the site as well as sufficient hydrant water flow to meet the fire-fighting requirements established by the LAFD. Further, the Project and Alternative 4 would have a site design that would be reviewed by LAFD and would be required to provide sufficient accessibility for fire-fighting activities. The Project and Alternative 4 would comply with regulatory measures for safety and would provide additional voluntary provisions for addressing emergency situations with on-site equipment and personnel. Both the Project and Alternative 4 would implement PDF-TRAF-1, to provide a Construction Management Plan to improve access around the construction site. PDF-FIRE-1, implemented under both the Project and Alternative 4, would facilitate occupants' voluntary fire and emergency medical procedures during operation that would reduce demand on the LAFD. With the implementation of PDFs and applicable regulations, neither the Project nor Alternative 4 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither the Project nor Alternative 4 would result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection would be less than significant under both the Project and Alternative 4. However, because Alternative 4 would incrementally reduce occupation of the Project Site and would eliminate the Project's high-rise component, impacts with respect to fire protection services would be less than under the Project.

(ii) *Police Protection*

The ratio of officers to service population is used by LAPD as an indicator of the level of service offered, and serves as a basis for measuring the increase in police services demand. Alternative 4 would result in a net increase 57 residential units and service population of 343;<sup>53</sup> whereas, the Project would generate a service population of approximately 740. Alternative 4 would generate an increase in population from 165,000 residents to 165,343 residents in the Hollywood Community Police Station service area, and would reduce the officer to resident ratio from one officer per 468 residents to one officer per 470 residents, based on 352 sworn officers. With a generation factor of 16 crimes per 1,000 residents, Alternative 4 could potentially result in approximately 5.5 additional crimes per year (not withstanding proposed PDFs), compared to 12 additional crimes under the Project. The Project and Alternative 4 would both implement PDF-POL-2 through

<sup>53</sup> Based on City CEQA Thresholds Guide, K.1, Police Service Population Conversion Factor of 3 persons per residential unit (39), 0.004 persons/sf offices (400), and 0.003 persons/sf restaurants/retail (36), minus the existing use (132) = 343 service population.

PDF-POL-5, to provide 24-hour security personnel and cameras, design landscaping to not impede visibility, require participation in community crime prevention efforts, and provide building diagrams to the LAPD. Implementation of applicable PDFs would reduce Alternative 4 and the Project's demand on police services. With implementation of PDFs, neither the Project nor Alternative 4 would increase fire 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, neither the Project nor Alternative 4 would result in potential physical impacts associated with construction of police facilities. Therefore, impacts with respect to police protection would be less than significant under both the Project and Alternative 4. However, because Alternative 4 would generate a lower service population than under the Project, impacts with respect to police protection services would be less under Alternative 4.

### *(iii) Schools*

Alternative 4's 13 residential units would result in a net decrease (-8) of school age children<sup>54</sup> compared to the Project's 210 residential units, which would generate a net increase of approximately 52 new school age children. The additional students from the Project would attend local schools and have the potential to exceed the number of available seats at local schools. However, pursuant to Section 65995 of the California Government Code, the 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 would be less than significant under the Project. However, because Alternative 4 would reduce demand for school services, rather than increase demand, impacts with respect to school services would be less than under the Project.

### *(iv) Parks and Recreation*

Alternative 4 would reduce residential population from the estimated existing 107 residents to approximately 32 residents, which would decrease demand for parks and recreational facilities. Both the Project and Alternative 4 would comply with LAMC Section 21.10.3 regarding a dwelling unit construction tax of \$200 for each new residential unit for City acquisition of new park space. Furthermore, both the Project and Alternative 4 would meet the applicable requirements set forth in LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space and parkland requirements. Thus, neither the Project nor

<sup>54</sup> Student generation rates for multi-family units are 0.1999 elementary students per unit, 0.0546 middle school students per unit, and 0.0943 high school students per unit for high school students. Based on these factors, Alternative 4 (13 units) would generate 3 elementary school students, 1 middle school students, and 1 high school students for an estimated total of 5 students. Subtracting the Project Site's estimated existing students (13), the net total would be -8 students.

Alternative 4 would 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. Impacts with respect to parks and recreation would be less than significant. However, because Alternative 4 would decrease new population, impacts with respect to parks and recreation services would be less than under the Project.

(v) *Libraries*

Alternative 4 would reduce residential population from the estimated existing 107 residents to approximately 32 residents, which would decrease demand for parks and recreational facilities. However, all of the residential units under either the Project or Alternative 4 would be equipped to use individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. In addition, both the Project and Alternative 4 would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. Based on the above, target service populations, and library sizing standards, operation of either the Project or Alternative 4 would not create any new exceedance of the capacity of local libraries to adequately serve the proposed residential population. Therefore, neither the Project nor Alternative 4 would 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. However, Alternative 4 would reduce residential population, impacts with respect to library services would be less than under the Project. However, because Alternative 4 would generate less new population, impacts with respect to library services would be less than under the Project.

(l) *Transportation*

The following discussion of Project impacts is based on the Alternatives Analysis Memorandum prepared by Gibson Transportation Consulting, Inc., which is provided in Appendix L-3 of this EIR. The discussion evaluates the relative differences and similarities between Alternative 4 and the Project.

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

The Project and Alternative 4 would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. The Project and Alternative 4 would not conflict with policies of Mobility Plan 2035 adopted to protect the environment and reduce VMT. The Project and

Alternative 4 would also be consistent with applicable transportation goals of the Hollywood Community Plan Objective 6 to coordinate land use densities and to promote the use of transit. Mitigation Measure TRAF-1 under the Project and Alternative 4 would implement a TDM Program to address trip reduction and use of alternate modes of transportation. The Project and Alternative 4 would not conflict with VisionZero to reduce traffic-related deaths or with LADOT MPP, Section 321, regarding driveway design standards. While the Project would increase residential population, Alternative 4 would increase residential and employment population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. As with the Project, Alternative 4 would include bicycle parking spaces for residents, employees, and visitors. The Project and Alternative 4 would also provide for pedestrian improvements, including streetscape and lighting improvements along the street frontages, which would enhance pedestrian safety. The Project and 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 under the Project and Alternative 4.

*(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

**Table V-10, VMT Analysis Summary – Alternative 4**, below, illustrates the daily VMT before and after implementation of TDM strategies (Mitigation Measure MM-TRAF-1). As shown, Alternative 4 would generate average household VMT per capita of 4.0 prior to mitigation, which is less than the Central APC impact threshold of 6.0 and, therefore, would not result in a significant VMT impact. Alternative 4 would generate average work VMT per employee of 7.8 prior to mitigation, which is more than the Central APC impact threshold of 7.6 and, therefore, would result in a potentially significant VMT impact. Following implementation of mitigation, Alternative 4 would generate average work VMT per employee of 7.5 which is below the impact threshold and, therefore, would reduce the VMT impact to a less than significant level. Since Alternative 4 is primarily office uses rather than residential, the TDM program (MM-TRAF-1) would require the implementation of a parking cash-out strategy (rather than unbundled parking), whereby office employees would be refunded the cost their employer would pay for a parking space within the building should the employee forego the space. With mitigation Alternative 4 would generate approximately 9,458 VMT per day compared to 11,929 VMT under the Project (after mitigation). With mitigation, VMT impacts under either the Project or Alternative 4, when considering both household VMT per capita and work VMT per employee, would be less than significant. While the household VMT under Alternative 4 would be less than the Project, the 7.5 worker VMT per employee under Alternative 4 would be greater than the Project's worker VMT per employee of 7.1. When considering that office is the primary use under Alternative 4, the employee VMT is viewed as the most relevant VMT factor. Because the employee VMT factor is higher than the Project, VMT impacts would be greater under Alternative 4 than under the Project.

**TABLE V-10**  
**VMT ANALYSIS SUMMARY – ALTERNATIVE 4**

Alternative Land Uses	Size	
Multi-Family Housing	13 units	
Office	100,000 square feet	
Retail	3,000 square feet	
Restaurant	9,000 square feet	
Analysis <sup>a</sup>		
Resident Population	29	
Employee Population	442	
Project Area Planning Commission	Central	
Project Travel Behavior Zone	Compact Infill (Zone 3)	
	Alternative 4 before Mitigation	Alternative 4 with Mitigation
Daily VMT <sup>b</sup>	9,591	9,458
Home-Based Production VMT <sup>c</sup>	118	118
Home-Based Work Attraction VMT <sup>d</sup>	3,455	3,322
Household VMT per capita <sup>e</sup>	4.0	4.0
Impact Threshold	6.0	6.0
Significant Impact	NO	NO
Work VMT per Employee <sup>f</sup>	7.8	7.5
Impact Threshold	7.6	7.6
Significant Impact	YES	NO

## NOTES:

- a The analysis is from City of Los Angeles VMT Calculator output reports provided in Appendix L-3 of this Draft EIR.
- b Total daily VMT is the Alternative-generated total VMT generated by all trips, regardless of trip purpose, to and from the Project Site.
- c Home-Based Work Production VMT are one-way trips to a workplace destination originating from a residential use at the Project Site.
- d Home-Based Work Attraction VMT are one-way trips to a workplace destination at the Project Site originating from a residential use.
- e Household VMT per capita is the total Home-Based VMT productions divided by the residential population of the project.
- f Worker VMT per employee is the total Home-Based Work Attractions divided by the employment populations of the project.

SOURCE: City of Los Angeles VMT Calculator and VMT Calculator User Guide; Gibson Transportation Consulting, 2020.



*(i) Design Hazards*

The Project and Alternative 4 would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. Total existing curb cuts would be reduced from five to a total of three. 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. The Project and Alternative 4 would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. They would also contribute to overall walkability through enhancements to the Project Site and streetscape and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant and similar under the Project and Alternative 4.

*(ii) 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. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project or 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 and approval of Project Site access and circulation plans by the LAFD, the Project and Alternative 4 would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access would be less than significant and similar under the Project and Alternative 4.

*(m) Tribal Cultural Resources*

The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment indicated no known Tribal cultural resources within the Project Site or surrounding area. However, excavations associated with the Project could have a potential, albeit a low potential, to encounter previously unknown and buried Tribal cultural resources. In the unlikely event that buried Tribal cultural resources are encountered during construction, 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. The Project and Alternative 4 require the same scale of site preparation and surface grading and, as such, would have similar opportunity to uncover any potential Tribal cultural resources. Compliance with the City's standard Conditions of Approval would ensure that both the Project and Alternative 4 would result in similar and less than significant impacts with respect to Tribal cultural resources.

(n) *Utilities and Service Systems – Water, Wastewater, Solid Waste*

(i) *Water Supply*

Alternative 4 would generate demand for water resources, as shown in **Table V-11, Alternative 4 Estimated Wastewater Generation and Water Use**. As shown in Table V-11 Alternative 4 would require 23,720 gpd without conservation and 19,136 gpd with conservation. The net increase, achieved by subtracting existing uses would be 11,840 gpd or 13.26 AFY. By comparison, the Project would require approximately 62,995 gpd or approximately 67.13 AFY.<sup>55</sup> The water supply analysis for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. The water supply analysis for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. Because Alternative 4 would substantially reduce the Project's water demand, it is assumed that LADWP would also have sufficient supply for the Alternative. As with the Project, Alternative 4 would include numerous design features to reduce the demand for water consumption. Water infrastructure and water supply would be sufficient to meet the demands of both the Project and Alternative 4 without mitigation and, as such, both the Project and Alternative 4 would have a less than significant impact with respect to water services. However, because Alternative 4 would generate a lower water demand than the Project, impacts would be less than under the Project.

(ii) *Wastewater*

Both the Project and Alternative 4 would increase wastewater generation over existing conditions; thus, increasing demand on the existing Hyperion Treatment Conveyance System or Hyperion Treatment Plant. As shown in Table V-11, Alternative 4 would generate approximately 19,136 gpd, with a net increase (subtracting existing uses) of 11,136 gpd. By comparison the Project is estimated to increase on-site wastewater generation by approximately 62,995 net gpd.<sup>56</sup> The Project's additional wastewater generation would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Wastewater generation under Alternative 4 would a fraction of the wastewater generated by the Project. Because the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant have adequate capacity to serve the Project, it would also have sufficient capacity to serve Alternative 4. Impacts with respect to wastewater treatment and conveyance under both the Project and Alternative 4 would be less than significant. However, because Alternative 4 would generate substantially less wastewater than under the Project, impacts with respect to wastewater conveyance and treatment systems would be less.

<sup>55</sup> See Table IV.N.1-8, *Estimated Domestic Water Demand for Project*, in Section IV.N.1 of this Draft EIR.

<sup>56</sup> See Table IV.N.1-7, *Wastewater Generated During Operation*, in Section IV.N.1 of this Draft EIR.

**TABLE V-11**  
**ESTIMATED WASTEWATER GENERATION AND WATER USE FOR ALTERNATIVE 4**

Land Use	Quantity	Factor (gpd) <sup>a</sup>	Wastewater Generation (gpd)	Daily Water Demand (gpd) <sup>b</sup>	Annual Water Demand (AFY) <sup>c</sup>
<b>Existing Uses</b>					
			6,080	7,296	8.17
<b>Proposed Uses</b>					
Residential: Condominiums	13 units	150 gpd/unit	1,950	2,340	4.84
Offices	100,000 sf	0.17/sf	5,000	6,000	
Retail	3,000 sf	0.05/sf	150	180	
Restaurants <sup>d</sup>	400 seats	30 gpd/seat	12,000	14,400	
Parking Structure	40,000 sf	20 gpd/1,000 sf	19,100	800	1.08
<b>Subtotal</b>			19,100	23,720	15.85
<i>Less Additional Conservation (20%)<sup>e</sup></i>				-4,584	-2.95
<b>Total</b>			19,100	19,136	21.43
<b>Net Increase (Proposed minus Existing)</b>			<b>13,020</b>	<b>11,840</b>	<b>13.26</b>

a Wastewater generation factors obtained from the Project's Sewer Capacity Availability Report (SCAR), prepared by the City of Los Angeles Bureau of Engineering, processed on December 4, 2015 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential Categories, dated April 6, 2012.

b Water demand is consistent with wastewater generation. To be conservative, 20 percent was added to account for outdoor water use.

c An acre-foot equals approximately 325,851 gallons

d Estimated 20 percent water use reduction due to additional water conservation commitments agreed by the Project applicant: installation of waterless urinals; 1.75 gpm for shower heads; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible. The parking structure is excluded from this reduction as water conservation measures do not apply.

SOURCE: ESA, 2020.

### (iii) Solid Waste

Both the Project and Alternative 4 would generate approximately 3,307 tons of C&D waste associated with demolition. However, because the building size would be reduced, Alternative 4 would generate less C&D waste associated with building construction. Demolition and construction waste 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 both be less than significant, although less under Alternative 4.

As shown in **Table V-12, Alternative 4 Estimated Operational Solid Waste Generation**, Alternative 4 would generate 819 pounds per day and 127.2 tons per year. In subtracting the existing uses, Alternative 4 would generate 281 pounds per day and 51.4 tons per year. Based on Citywide diversion rates of at least 76.4 percent, Alternative 4's solid waste generation would be reduced to 66.32 pounds per day and 12.13 tons per year. Taking into consideration the City's diversion rate of 76.4 percent, the Project would generate a net increase of 622 pounds per day and 113.55 tons of solid waste per year.<sup>57</sup> The Project's annual solid waste generation, with diversion, would be approximately 0.001 percent of the County's annual waste generation and would account for less than 0.0001 percent of the remaining capacity. Respectively, with diversion, Alternative 4's annual solid waste generation would be approximately 0.00012 percent of the County's annual waste generation and less than 0.00001 percent of the remaining capacity.<sup>58</sup> Because of the small increase in waste disposal represented by either the Project or Alternative 4, neither would 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. As such, impacts with respect to solid waste generation would be less than significant. However, because Alternative 4 would generate substantially less solid waste than under the Project, impacts with respect to waste disposal would be less than under the Project.

**TABLE V-12**  
**ALTERNATIVE 4 ESTIMATED SOLID WASTE GENERATION - OPERATION**

Land Uses	Quantity (units/sf)	Factor <sup>a</sup>	Solid Waste Generated (lbs/day) <sup>a</sup>	Solid Waste Generated (tons/year) <sup>d</sup>
Existing			538	98.2
<b>Alternative 4</b>				
Residential	13 units	12.23 lbs./unit	159	29.2
Offices	100,000 sf	6 lbs/1,000 sf	600	109.5
Restaurant/Retail	12,000 sf	5 lbs/1,000 sf	60	10.9
Total			819	149.6
<b>Net Increase (Proposed minus Existing)</b>			<b>281</b>	<b>51.4</b>

a Generation factors provided by CalRecycle at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed January 2019.

SOURCE: ESA, 2020

<sup>57</sup> See Table IV.N.1-11, *Estimated Operational Solid Waste Generation*, in Section IV.N.1 of this Draft EIR.

<sup>58</sup> The estimated Los Angeles County annual disposal rate is estimated to be 9.457 million tons per year and the remaining capacity is estimated to be 114 million tons.

(o) *Utilities and Service Systems – Energy Infrastructure*

Alternative 4, as with the Project, would utilize energy infrastructure to accommodate its 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. 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 2 would be less than significant. As off-site energy infrastructure would accommodate energy demand under Alternative 4, impacts would be similar to the Project.

(3) Relationship of the Alternative to Project Objectives

Alternative 4, the Primarily Office Mixed-Use Alternative, would consist of 112,000 square feet of offices, 12,000 square feet of retail/restaurant uses, and 13 residential condominiums. Alternative 4 would not provide replacement housing for the 44 displaced units currently occupying the Project Site. Alternative 4 would not provide a hotel, or increase residential densities in a Transit Priority area, or be characterized by other features of the Project as reflected in the Project objectives. Alternative 4 would not meet the following Project objectives:

**Objective 1:** To construct an infill development that balances commercial and residential uses by providing a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the Project Site area.

**Objective 2:** To redevelop the underutilized Project Site at a density envisioned for a Transit Priority Area in the Regional Center and Hollywood Center designations on and surrounding the Project Site, with an economically viable and attractive transit-oriented high-density mixed-use development.

**Objective 4:** To provide a diverse mix of dwelling units that appeal to a range of household sizes to help meet the critical demand for new housing in the Hollywood Community Plan area.

**Objective 5:** To increase the City's stock of rent controlled units under the City's RSO through a project that provides 100 percent of its residential apartment units as RSO units.

**Objective 6:** To provide a right of return for residents of existing onsite residential apartment units subject to the Rent Stabilization Ordinance.

Alternative 4 would not include a hotel use and, thus, would only be partially consistent with the following objective:

**Objective 3:** To promote and support local and regional mobility, greenhouse gas and air quality objectives to reduce vehicle miles traveled, reduce reliance on single-passenger vehicles and increase the use of public transit, and maximize infill development by constructing a high-density residential, hotel and commercial/restaurant mixed-use development on a site within a designated Transit Priority Area that is located within one-quarter mile of key public transit facilities, including the Hollywood and Vine Red Line Station.

**Objective 7:** To support job creation and to increase business opportunities within Los Angeles by developing the Project's hotel and commercial/restaurant uses on a site well-served by transit.

Alternative 4 would be consistent with the following objectives:

**Objective 8:** To revitalize the streetscape surrounding the Project Site and encourage pedestrian activity and bicycle use by creating a streetscape design that allows for outdoor café tables, parkway planters and bicycle parking within an overall landscape design that integrates the Project development into the surrounding urban neighborhood.

## 7. Environmentally Superior Alternative

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. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes (1) the No Project/No Build Alternative, (2) the Primarily Residential Mixed-Use Alternative, (3) the No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative, and (4) the Primarily Office Mixed-Use Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in **Table V-13, Comparison of Impacts Associated with the Alternatives and the Project**, based on the detailed evaluation of the potential impacts associated with each Alternative provided in the previous sections. As indicated in Table V-13, the No Project/No Build Alternative would have no direct impacts on the environment and, as such would have fewer environmental consequences than under the Project or other Alternatives. Further, No Project/No Build Alternative would avoid the Project's short term significant and unavoidable construction noise and

vibration impacts. Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative.

However, this Alternative would not provide the beneficial effects of the Project and other Alternatives. As shown in **Table V-14, *Ability of Alternatives to Meet Project Objectives***, the No Project/No Build Alternative would not allow for high-density residential or commercial uses within a TPA. Thus, it would not promote a land use pattern that reduces VMT or meet any of the other objectives of the Project.

Alternative 2, the Primarily Residential Mixed-Use Alternative, would reduce the Project's less than significant light and glare, construction (less than significant after mitigation) and operation air emissions, archaeological and paleontological resources, exacerbation of existing geological conditions, unstable geological units, GHG, construction hydrology and water quality, operation noise, population/housing, police protection, VMT, water, wastewater, and solid waste impacts. However, Alternative 2 would incrementally increase the Project's less than significant impacts on schools, libraries, and parks/recreational facilities. Alternative 2 and the other Alternatives would reduce the duration of the Project's significant and unavoidable short-term construction noise and vibration impacts, but would not reduce these impacts to less than significant levels. As shown in Table V-14, Alternative 2 would partially or fully meet all of the Project objectives, including the concentration of high-density housing in a TPA.

Alternative 3, the No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative, and Alternative 4, the Primarily Office Mixed-Use Alternative, would reduce most of the Project's less than significant impacts because of their reduced building sizes and smaller scale of development, resulting in lower residential occupancy and shorter duration of construction activity. Although these Alternatives would reduce the duration of the Project's significant and unavoidable construction noise and vibration impacts, it would not reduce these impacts to less than significant levels.

Alternatives 3 and 4 would not implement the intent of the TPA to densify housing in proximity to a transit station compared to Alternative 2. Therefore, Alternatives 3 and 4 would not contribute to the same extent as the Project and Alternative 2 to a land use pattern conducive to a reduction in Citywide VMT, which is part of the intent of the TPA designation. Alternative 4 would result in a net housing deficit, and would not provide RSO (rental) units, or replacement housing for existing removed residential units. As such, it would not address Citywide housing shortages, or accommodate right of return for existing on-site residents. Both Alternatives 3 and 4 would not meet several of the expressed purposes and objectives of the Project (see Table V-14, below).

**TABLE V-13**  
**COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT**

	<b>Proposed Project</b>	<b>Alternative 1 No Project/No Build</b>	<b>Alternative 2 Primarily Residential Mixed-Use</b>	<b>Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus</b>	<b>Alternative 4 Primarily Office Mixed- Use</b>
<b>A. Aesthetics/Visual Resources</b>					
Views	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Scenic Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Similar (Less Than Significant)
Regs Governing Scenic Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Visual Character and Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Light and Glare	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<b>B. Air Quality</b>					
AQMP Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Construction Emissions	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)
Operation Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<b>C. Cultural Resources</b>					
Archaeological Resources	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)
Historical Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)



				<b>Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus</b>	<b>Alternative 4 Primarily Office Mixed- Use</b>
	<b>Proposed Project</b>	<b>Alternative 1 No Project/No Build</b>	<b>Alternative 2 Primarily Residential Mixed-Use</b>		
<b>D. Energy</b>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>E. Geology, Soils, and Paleontological Resources</b>					
Exacerbation of Environmental Conditions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Unstable Geologic Units	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Expansive Soils	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Paleontological Resources	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)
<b>F. Greenhouse Gas Emissions</b>					
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<b>G. Hydrology and Water Quality</b>					
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>H. Land Use and Planning</b>					
Plan Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)

	<b>Proposed Project</b>	<b>Alternative 1 No Project/No Build</b>	<b>Alternative 2 Primarily Residential Mixed-Use</b>	<b>Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus</b>	<b>Alternative 4 Primarily Office Mixed- Use</b>
<b>I. Noise</b>					
Construction Noise and Vibration	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Operation Noise and Vibration	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)
<b>K. Population and Housing</b>					
Population, Housing, and Employment	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)
<b>K. Public Services</b>					
Fire Protection and Emergency Medical Services	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Police Protection	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Schools	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Parks and Recreation	Less Than Significant with Mitigation	Less (No Impact)	Greater (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Libraries	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

	<b>Proposed Project</b>	<b>Alternative 1 No Project/No Build</b>	<b>Alternative 2 Primarily Residential Mixed-Use</b>	<b>Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus</b>	<b>Alternative 4 Primarily Office Mixed- Use</b>
<b>L. Transportation</b>					
Conflict with Plans, Programs, Ordinances, or Policies	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b) (VMT)	Less Than Significant with mitigation	Less (No Impact)	Less (Less Than Significant with mitigation)	Less (Less Than Significant)	Greater (Less Than Significant with mitigation)
Design Hazards	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Emergency Access	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>M. Tribal Cultural Resources</b>					
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<b>N.1 Utilities and Service Systems – Water, Wastewater, Solid Waste</b>					
Water Supply	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Wastewater	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Solid Waste	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<b>N.2 Utilities and Service Systems – Energy Infrastructure</b>					
	Less than significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

SOURCE: ESA, 2020.

**TABLE V-14**  
**ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES**

Project Objective	Ability to Meet Project Goal/Objective				
	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Primarily Residential Alternative	Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus Density	Alternative 4 Mixed-Use Primarily Office
1. To construct an infill development that balances commercial and residential uses by providing a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the Project Site area.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Does Not Meet Objective	Does Not Meet Objective
2. To redevelop the underutilized Project Site with an economically viable and attractive transit-oriented high-density mixed-use development that is appropriate for the Project Site's location in a Transit Priority Area and is consistent with its designation as Regional Center and Hollywood Center.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Does Not Meet Objective	Does Not Meet Objective
3. To promote and support local and regional mobility, greenhouse gas and air quality objectives to reduce vehicle miles traveled, reduce reliance on single-passenger vehicles and increase the use of public transit, and maximize infill development by constructing a high-density residential, hotel and commercial/restaurant mixed-use development on a site within a designated Transit Priority Area that is located within one-quarter mile of key public transit facilities, including the Hollywood and Vine Red Line Station.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Does Not Meet Objective	Partially Meet Objective

Project Objective	Ability to Meet Project Goal/Objective				
	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Primarily Residential Alternative	Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus Density	Alternative 4 Mixed-Use Primarily Office
4. To provide a diverse mix of dwelling units that appeal to a range of household sizes to help meet the critical demand for new housing in the Hollywood Community Plan area.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Does Not Meet Objective
5. To increase the City's stock of rent controlled units under the City's RSO through a project that provides 100 percent of its residential apartment units as RSO units.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Does not Meet Objective
6. To provide a right of return for residents of existing onsite residential apartment units subject to the RSO.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Does not Meet Objective
7. To support job creation and to increase business opportunities within Los Angeles by developing the Project's hotel and commercial/restaurant uses on a site well-served by transit.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Does not Meet Objective	Partially Meets Objective
8. To revitalize the streetscape surrounding the Project Site and encourage pedestrian activity and bicycle use by creating a streetscape design that allows for outdoor café tables, parkway planters and bicycle parking within an overall landscape design that integrates the Project development into the surrounding urban neighborhood.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective

SOURCE: ESA, 2020

In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, Alternative 2 is selected as the Environmentally Superior Alternative since it would incrementally reduce several of the Project's environmental impacts and would be substantially consistent with the purpose of the Project, particularly with respect to City policies regarding concentration of development within Regional Centers and TPAs for the purpose of reducing VMT.

# Chapter VI

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## Other CEQA Considerations

### 1. Significant Unavoidable Impacts

Section 15126.2(a) of the State *CEQA Guidelines* requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. The Project's significant and unavoidable impacts on the environment are evaluated in detail in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, and summarized below.

**Construction Noise:** As analyzed in Section IV.I, *Noise and Vibration*, MM-NOI-1 provides for sound barriers that would achieve a noise reduction of 15 dBA between Project construction and off-site receptor locations along Argyle Avenue (R1), Vista Del Mar Avenue (R3), and Carlos Avenue (R4). Sound barriers would not be feasible to reduce the impacts to sensitive receptors (represented by measurement location/sensitive receptor location R2) along the north of Yucca Street since the Project's construction staging area and/or traffic entrance would be located on the south side of Yucca Street adjacent to the Project Site. Although the noise reduction provided by the noise barriers would be considered a substantial reduction, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at the residential uses along Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3) during some phases of construction. In addition, the sound barrier would not reduce the noise levels at the upper floors (i.e., 3<sup>rd</sup> to 18<sup>th</sup> floor) of the multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue (R1) or the upper floors (i.e. 3<sup>rd</sup> floor to 5<sup>th</sup> floor) of the five-story mixed-use residential uses (R4) along Carlos Avenue since the proposed sound barrier would not block the line of sight between the construction site and upper floors of the 18-story multi-family residential use (R1) or the five-story mixed-use residential uses (R4). Thus, construction noise impacts would be significant and unavoidable at the upper floors (i.e., 3<sup>rd</sup> to 18<sup>th</sup> floor) of the multi-family residential uses at the southwest corner of Yucca Street and Argyle Avenue (R1), at the adjacent residential uses along Vista Del Mar Avenue (R3), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (R4), and those on the north side of Yucca Street (R2), even after implementation of Mitigation Measure MM-NOI-1.

Mitigation Measure MM-NOI-2 requires Project contractors to employ state-of-the-art noise minimization strategies, as feasible, when using mechanized construction equipment. While noise minimization strategies will reduce noise where feasible,

construction noise impacts would remain significant and unavoidable, even with implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2 together.

**Construction Groundborne Vibration/Noise.** Implementation of Mitigation Measure MM-NOI-3 would ensure that construction groundborne vibration levels would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue (R3). This mitigation measure requires a 15-foot buffer between the nearest residential building and heavy construction equipment operations. At 15 feet, the groundborne vibration levels would be reduced to 0.191 inches per second (PPV). The mitigated level of 0.191 inches per second (PPV) is less than, but still close to the significance threshold of 0.2 inches per second (PPV). Therefore, MM-NOI-4 is also recommended to mitigate potential groundborne vibration impacts. Implementation of MM-NOI-4 would ensure that groundborne vibration levels are below the thresholds associated with potential damage to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction. However, because MM-NOI-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.

In addition, temporary construction-related groundborne vibration and groundborne noise impacts on human annoyance would be reduced at the adjacent residential uses along the west side Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3). However, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. Therefore, temporary construction-related groundborne vibration structural and groundborne vibration and noise human annoyance impacts would be significant and unavoidable.

## **2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts**

In addition to identification of the Project's significant unavoidable construction noise and vibration impacts, Section 15126.2(c) of the State *CEQA Guidelines* 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 unavoidable impacts, because: 1) the Project would achieve a considerable number of community objectives regarding the type of development encouraged along a mixed-use corridor within a Transit Priority Area (TPA); 2) the Project would increase the City's stock of rent controlled units under the City's RSO; 3) the Project's significant unavoidable impacts caused by construction noise and vibration would be temporary and consistent with most construction activity in the



Project vicinity; 4) the Project would provide economic benefits to the community and would support revitalization of the Hollywood community pursuant to the Hollywood Redevelopment Plan.

The Project Objectives include a number of items that are consistent with, and that contribute to, implementation of Community objectives established in the City's General Plan Framework, Hollywood Community Plan, and Hollywood Redevelopment Plan. The Project would, pursuant to those objectives, contribute to the revitalization of the Hollywood Community through a balance of residential and commercial uses, including a mix of retail, dining, multi-family residential and hotel uses that are complementary to the existing uses in the area. The Project would provide RSO housing. It would place new population density and create jobs in proximity to a Metro Red Line station, numerous Metro regional and local bus lines, and LADOT Dash bus lines. Also, it would integrate the Project development into the surrounding urban neighborhood by encouraging pedestrian activity and bicycle use and through streetscape design that allows for outdoor café tables, parkway planters, and bicycle parking within an overall landscape design. Furthermore, the Project would provide a complementary residential population in proximity to nearby retail, employment, and entertainment uses within a designated Regional Center and the designated Hollywood Center.

The Project's significant unavoidable construction-related noise/vibration impacts would be limited in nature and are typical of impacts occurring at development sites in urban areas, particularly within infill locations in proximity to existing development and active related projects. These impacts would occur only during construction and only on limited occasions when the maximum intensity construction activity is occurring. The associated mitigation measures and project design features would reduce construction impacts to the maximum extent feasible.

Four alternatives to the Project are considered in Chapter V, *Alternatives*, of this Draft EIR. The alternatives analysis reviews the reasonably likely use of the Project Site in the event that the Project is not implemented (the No Project/No Build Alternative) and include a reduced project scenario (Alternative 3 - the No Commercial Zone Change, No High Density Residential, No Density Bonus Alternative), which would be consistent with the Project Site's existing zoning. However, even the reduced scale of development would entail construction activity and, because of the proximity of sensitive receptors would still result in a significant and unavoidable construction noise/vibration impact. Nonetheless, because the scale of excavation and the use of heavy equipment would be less under Alternative 3, and occur within a shorter time frame, construction noise/vibration impacts would be less than under the Project.

The Primarily Office Alternative (Alternative 4) would reduce the total scale of development and excavation required for parking, but would not reduce the significant construction noise impact to a less than significant level. The Primarily Office Alternative would reduce the Project's FAR from 6.6:1 to 3.81:1 averaged over the Project Site and would provide a multi-family residential uses consistent with the R3 zone density in the

Building 2 site. Alternative 2, the Primarily Residential Mixed-Use Alternative would have the same FAR as the Project but would also require less excavation for parking. Under Both Alternative 2 and 4, peak construction activity would still generate significant and unavoidable, temporary construction noise and vibration impacts, as under the Project. Although because of less excavation, the duration of impacts related to noise and vibration levels during the excavation phase under Alternatives 2 and 4 would be less than under the Project. One of the purposes of these alternatives is to reduce the scale of subterranean parking and associated excavation to reduce the Project's significant construction-related noise impacts.

The No Project/No Build Alternative would avoid the Project's significant and unavoidable construction noise/vibration impact, but would not achieve the Project's underlying purpose, which is to provide an infill development that balances commercial and residential uses and, further, would not achieve any of the Project objectives.

Alternatives 2, 3, and 4 would all incrementally reduce required parking spaces and the overall scale and duration of construction. However, because the required demolition and grading associated with site preparation, building foundations, and other activities would be required for any new development, maximum days of activity would produce construction noise/vibration levels similar to those of the Project. Therefore, none of these Alternatives would reduce the Project's construction noise/vibration impact to a less than significant level.

The Project design is intended to serve as a gateway or landmark for motorists entering Hollywood, enhance the pedestrian environment in the Project vicinity, and contribute to the character of this mixed-use corridor. The Project would contribute to a land use patterns that, broadly, would reduce VMT. Furthermore, the Project would comply with the applicable requirements of the 2016 CALGreen Code and City of Los Angeles Green Building Code, and achieve the equivalent of the USGBC LEED® Certified level.

Finally, the Project is being proposed, notwithstanding significant unavoidable construction-related noise/vibration because it would support the revitalization objectives of the Hollywood Redevelopment Plan and contribute to the economy of the local area and the region. The Project would create new jobs for both construction and long-term operations. It would provide new population to support local businesses and increase revenue for the City.

### **3. Significant Irreversible Environmental Changes**

According to Sections 15126.2(d) of the State *CEQA Guidelines*, 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(d) indicates:

*Uses of nonrenewable 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, nonrenewable 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 nonrenewable 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 densification of development within the Transit Priority Area, the Project would support a land use pattern that would reduce reliance on private automobiles, vehicle miles traveled, 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 and SCAG-designated High Quality Transit Area, and an area identified as preferred for high density development to reduce vehicle miles traveled 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 2016 CALGreen Code, and achieve the equivalent of the USGBC LEED Gold Certification under the LEED version 2009 (v3) or the Silver Certification under the LEED v4 rating system. The Project would incorporate measures and performance standards to support its LEED Gold or Silver Certification, which include but are not limited to the following: implementation of a construction waste management plan; exceeding Title 24 (2016) Building Standards Code requirements to reduce building energy costs by a minimum of 5 percent; providing solar panels; use of high efficiency fixtures and appliances and other water conservation features; drought tolerant landscaping; dedicated on-site recycling area; and implementation of a transportation demand management program (TDM). As indicated in Section 4.F, *Greenhouse Gas Emissions*, the Project would result in a less than significant GHG impact 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.

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, nor 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 nonrenewable resources would not be significant.

## 4. Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines 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.

The Project would redevelop a site with two vacant buildings and a parking lot to a mixed-use building with 210 residential dwelling units, a 136-room hotel, and 12,570 square feet of ground-level retail and restaurant space. The new development would be located within the area identified in the General Plan Framework Element and Hollywood Community Plan as a Regional Center Commercial (West and Center Parcels fronting Yucca Street) and Medium Density Residential (East Parcels fronting Vista Del Mar). The Project Site is also located in an area designated in the Hollywood Redevelopment Plan for

revitalization. The Project Site is further designated by the City as within a TPA, which anticipates the densification of land uses within proximity to transit. As such, the Project has been anticipated and identified as expected growth. The Project would include a mix of uses that would be compatible with adjacent uses and representative of the type of development anticipated in the area. As described in the Initial Study (Appendix A-1 of this Draft EIR) added population or FAR that might occur as a result of Project implementation would represent a small component of population growth in the Project vicinity, and would be consistent with the development anticipated in the General Plan, Hollywood Community Plan, and Hollywood Redevelopment Plan. The Project's new development is within the range of development anticipated within the established SCAG regional forecast for the City of Los Angeles and Hollywood Community Plan area. The Project would not develop increase or induce residential density growth outside of the Project Site.

The Project Site is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. The Project's only off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project area. The Project would not develop new roads, or require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. It would not open inaccessible sites to new development other than existing opportunities for development that are already available.

Therefore, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts.

## **5. Potential Secondary Effects**

Section 15126.4(a)(1)(D) of the CEQA Guidelines 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 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 MM-AQ-1 requires the Project to use off-road diesel-powered construction equipment that meets the CARB and USEPA Tier 4 Final off-road emissions standards for equipment rated at 50 hp or greater during Project construction. Also, the mitigation measure requires that to the extent possible, pole power shall be made available for use with electric tools, equipment, lighting, etc. Because these requirements would apply only to construction equipment activities used within and immediately

adjacent to the Project Site, it would not result in secondary environmental effects at neighboring properties or within the broader community.

## **b) Cultural Resources**

Mitigation measures MM-ARCH-1 through MM-ARCH-3 would provide for the appropriate treatment and/or preservation of resources if encountered and, as such, the Project would not cause a substantial adverse change in the significance of an archaeological resource. The implementation of the mitigation measures would only occur within the Project Site and would not result in secondary environmental effects at neighboring properties or within the broader community.

## **c) Geology and Soils**

Mitigation measures MM-PALEO-1 through MM-PALEO-3 would provide for avoidance and recovery of resources if an inadvertent encounter were to occur. These measures, which would reduce potentially significant impacts to paleontological resources less than significant levels, would occur only within the Project Site and would not result in secondary environmental effects at neighboring properties or within the broader community.

## **d) Noise**

Mitigation measure MM-NOI-1 requires temporary on-site construction noise barriers (fencing). The fencing would be confined to the Project Site and would not result in secondary environment effects at neighboring properties or within the broader community. The mitigation measure would incrementally reduce adverse environmental effect and would not result in secondary effects at neighboring properties or within the broader community.

Mitigation measure MM-NOI-2 establishes fixed and mobile equipment noise control procedures to be followed during construction to avoid noise impacts at sensitive receptors. This measure would prohibit blasting, jack hammers or pile drivers, require the use of only electric power crane(s) and other electric equipment if commercially available, and limit unnecessary idling of equipment. Because these procedures would apply only to construction equipment used within the Project Site, it would not result in secondary environmental effects at neighboring properties or within the broader community.

Mitigation measure MM-NOI-3 requires that heavy construction equipment such as a large dozer, a large grader, and a large excavator shall not operate within 15 feet of the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue. A construction relations officer shall serve as a liaison with the nearest single-family residential building to respond to concerns regarding construction vibration within 24 hours of receiving a complaint. The liaison would ensure that steps will be taken to reduce construction vibration levels as deemed appropriate and safe by the on-site construction manager. The implementation of this measure, which would reduce vibration

impacts to less than significant levels, would apply only to the construction site and would not result in secondary environmental effects at neighboring properties or within the broader community.

Mitigation Measure MM-NOI-4 requires the services of a qualified professional to inspect and document the apparent physical condition of the residential buildings along Vista Del Mar Avenue and the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a groundborne vibration monitoring program capable of documenting the construction-related groundborne vibration levels at each residence during demolition, excavation, and construction of the parking garages. The purpose of MM-NOI-4 is to protect adjacent buildings from vibration damage and would not involve additional actions off the Project Site that would result in secondary environmental effects at neighboring properties or within the broader community.

Mitigation Measure MM-NOI-5 regards the use of an emergency generator. An emergency generator would be located in P1 and used in the event of a power outage for emergency safety lighting and other emergency needs. MM-NOI-5 requires the installation of a sound enclosure and/or equivalent noise-attenuating features (i.e., mufflers) around the emergency generator. The enclosure, which would provide approximately 25 dBA noise reduction, would require documentation prepared by a noise consultant verifying compliance with this measure at Plan Check. The implementation of this measure would apply only to the Project Site and would not result in secondary environmental effects at neighboring properties or within the broader community.

### **e) Transportation and Traffic**

Mitigation Measure MM-TRAF-1 would require the developer to implement a comprehensive Transportation Demand Management (TDM) Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The TDM Program shall be subject to review and approval by the City Department of Planning and LADOT. The TDM Program shall include the provision of unbundled parking for residents and the provision of promotions and marketing to encourage alternative modes of transportation to employees and residents. MM-TRAF-1 also provides other measures that could be included, such as provision of transit passes, short-term car rentals, incentives and support for formation of carpools/vanpools and/or participation in the future Hollywood Transportation Management Organization (TMO), when operational. The TDM Program is intended to reduce the impact of traffic from employees and residents of the Project during the most congested time periods of the day. Because this measure applies only to the Project Site's occupants and would reduce the number of vehicles on adjacent streets, it would not result in secondary environmental effects at adjacent streets or highways or within the broader community.

## 6. Effects Found Not to be Significant

Section 15128 of the CEQA Guidelines 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. Pursuant to Section 1512, 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 some topical area are not further analyzed in the Draft EIR. The Initial Study determined that the Project would not result in potentially significant impacts related to Agricultural Resources, Air Quality (objectionable odors), Biological Resources, Geology and Soils (alternative disposal systems), Hazards, Hydrology and Water Quality (inundation or flooding), Land Use (physically divide an established community and conflict with a conservation plan), Mineral Resources, Noise (airport land use plan, private airstrip), and Transportation/Circulation (change in air traffic patterns). For further discussion of these issues and more detailed evaluation of potential impacts, refer to the Project Initial Study, provided in Appendix A-1 of this Draft EIR.

## 7. New CEQA Topics

At the time the Initial Study was published, the Appendix G Thresholds did not address wildfire and telecommunications facilities. The City has since adopted the revised Appendix G thresholds and these topics are evaluated below.

### a) Wildfire

The Project Site is not located within a Very High Fire Hazard Severity Zone, nor is the Project Site near state responsibility lands.<sup>1</sup> The Project Site is located within a City-designated Fire Buffer Zone, an urbanized area located between Hollywood Boulevard and the Hollywood Freeway.<sup>2</sup> Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. In addition, the Project Site would be developed with new structures that would comply with LAMC and LAFD requirements pertaining to fire safety. Impacts related to wildfire would be less than significant. See also Section IV.K.1, *Fire Protection Services*, of this Draft EIR regarding the Project's fire safety components.

### b) Telecommunications

The Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure, such as the under-grounding of overhead telephone lines. Construction impacts associated with the installation of telecommunications

<sup>1</sup> City of Los Angeles Department of City Planning, Zimas, Parcel Profile Report. Available at: <http://zimas.lacity.org/>. Accessed August 28, 2019.

<sup>2</sup> City of Los Angeles Department of City Planning, General Plan Safety Element, November 26, 1966, Exhibit D. Available at: <https://planning.lacity.org/cwd/gnlpln/safteyelt.pdf>. Accessed August 28, 2019.



infrastructure would primarily involve trenching in order to place the lines below ground. The Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature PDF-TRAF-1. Under PDF-TRAF-1, installation of new telecommunication lines would occur within a very short time frame and would not cause street closures or other larger disruptions. All construction activity generated by the Project would be subject to a Construction Traffic Management Plan (PDF-TRAF-1), in which any required trenching or other street or sidewalk disruption would require the maintenance of safe and convenient routes for pedestrians and bicyclists through such measures as alternate routing and protection barriers where appropriate, temporary pedestrian and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way, advanced notification of temporary parking removals and duration of removals, coordination with public transit agencies to provide advanced notifications of stop relocations and durations, and other measures to reduce inconvenience to the public. Because of the short duration of installation of underground lines and implementation of safety measures, impacts associated with installation would not be significant.

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# **Chapter VII**

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California Government Code § 7060 et seq.

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### **Project Description**

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# Chapter VIII

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